UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Civil Action No. 0:26cv60206

FREDDY ANTONIO TELLEZ LOPEZ,

Petitioner,

v.

PAMELA BONDI, U.S. Attorney General,

Respondent.

On Petition for Writ of Habeas Corpus

MOTION FOR ATTORNEYS' FEES AND EXPENSES UNDER THE EQUAL ACCESS TO JUSTICE ACT

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Attorney for Respondent

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I. INTRODUCTION

Petitioner Freddy Antonio Tellez Lopez moved, under the Equal Access to Justice Act (hereinafter, "EAJA"), 28 U.S.C. § 2412(d), for attorney's fees incurred in challenging whether Petitioner's prolonged immigration detention without a bond hearing violated due process and rendered the detention unlawful. This Court granted the ***Petition for Writ of Habeas Corpus***, overruled Respondent's objections, adopted the Magistrate Judge's Report and Recommendation, and ordered Petitioner be provided a prompt, individualized bond hearing before immigration judge or be released from custody. *See 28 U.S.C. § 2241.* Mr. Tellez Lopez is entitled to fees and expenses in the amount of $4,753.94, including for time spent litigating the instant fee application. [1]

II. RELEVANT FACTS AND PROCEDURAL HISTORY

1. Freddy Antonio Tellez Lopez ("Petitioner" or "Mr. Tellez Lopez") is a native and citizen of Nicaragua, born on September 21, 1983, as evidenced by his passport.

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[1] This fee motion is timely. The Court issued its final judgment on February 26, 2026, and this request is submitted before April 27, 2026. See 28 U.S.C. § 2412(d)(1)(B); Fed. R. App. P. 4(a)(1); *Pierce v. Barnhart*, 440 F.3d 657, 661 (5th Cir. 2006) ("[T]he thirty-day EAJA clock 'begins to run after the time to appeal that final judgment has expired.'") (quoting *Melkonyan v. Sullivan*, 501 U.S. 89, 96 (1991)); *Fed. Election Comm'n v. Political Contributions Data, Inc.*, 995 F.2d 383, 385–86 (2d Cir. 1993); *Taylor v. United States*, 749 F.2d 171, 175 (3d Cir. 1984); *Kolman v. Shalala*, 39 F.3d 173, 175 (7th Cir. 1994); *Al-Harbi v. INS*, 284 F.3d 1080, 1083–84 (9th Cir. 2002); *Singleton v. Apfel*, 231 F.3d 853, 855 n.4 (11th Cir. 2000).

2. Petitioner entered the United States without inspection at the border and was not apprehended on **April 19, 2021**. On **January 3, 2022** he filed a timely application for asylum with USCIS.
3. On **October 1, 2025**, while attending a scheduled asylum interview at the Miami Asylum Office, Mr. Tellez was arrested by Immigration and Customs Enforcement (hereinafter "ICE") and placed into immigration detention..
4. On **January 13, 2026**, the Immigration Judge ordered Petitioner removed to Honduras,[2] and Petitioner appealed, arguing legal error and due process.
5. On **January 27, 2026**, Petitioner filed a ***Petition for Writ of Habeas Corpus*** pursuant to 28 U.S.C. § 2241 in the United States District Court for the Southern District of Florida, challenging the legality of his detention. [D.E.1]
6. On **February 2, 2026**, Respondents filed their ***Response to the Petition for a Writ of Habeas Corpus*** pursuant to 28 U.S.C. § 2241, arguing that the Petition should be denied on the grounds that Petitioner's detention was lawful under 8 U.S.C. § 1225(b)(2). [D.E.5]
7. On **February 4, 2026**, Petitioner filed a ***Reply to Respondent's Response to Petitioner's Writ of Habeas Corpus*** arguing that Respondents' reliance on 8 U.S.C. § 1225 was legally erroneous, as detention authority under that provision

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2 Petitioner is not from Honduras. He is a native and citizen of Nicaragua, as evidenced by his passport.

terminated once expedited removal was vacated, rendering his continued detention unlawful. [D.E.6]

8. Petitioner maintained that his detention was governed by 8 U.S.C. § 1226(a) and requested that the Court grant the Petition and order his release.

9. On **February 10, 2026**, the Magistrate Judge issued a Report and Recommendation recommending that the ***Petition for Writ of Habeas Corpus*** be granted to the extent that Respondents be ordered, within seven (7) days, to either provide Petitioner with an individualized bond hearing before an immigration judge or release him, and setting a seven (7) day deadline for the parties to file any objections. [D.E.9] *See 28 U.S.C. § 636(b)(1); S.D. Fla. Mag. R. 4(a).*

10. On **February 26, 2026**, the District Court issued an Order adopting the Magistrate Judge's Report and Recommendation, overruling Respondents' objections, granting the ***Petition for Writ of Habeas Corpus***, and ordering that Respondents provide Petitioner with a prompt, individualized bond hearing before an immigration judge or release Petitioner, and directing that the case be closed. [D.E.13]

11. On **March 3, 2026**, Petitioner was finally afforded a bond hearing, at which time an immigration judge ordered his release from custody upon the posting of a $15,000 bond.

III. ARGUMENT

A. Freddy Antonio Tellez Lopez is an Eligible and Prevailing Party

To qualify for an EAJA award, a petitioner first must establish that he is an eligible, prevailing party. 28 U.S.C. § 2412(d)(1)(B).

Mr. Tellez Lopez is an eligible party under EAJA because he is a private individual whose net worth has never exceeded 2 million dollars. *See* ***Exhibit A*** (Declaration of Mr. Tellez), ¶ 1; 28 U.S.C. § 2412(d)(2)(B).

Mr. Tellez also is a prevailing party because he has achieved a "material alteration of the legal relationship of the parties" and that alteration was "judicially sanctioned." *Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep't of Health & Human Res.*, 532 U.S. 598, 604–05 (2001); see also *Walker v. City of Mesquite, Tex.*, 313 F.3d 246, 249 (5th Cir. 2002).

In this case, over the government's opposition, the Court agreed with Mr. Tellez' position that detention without a bond hearing violated due process; therefore rendering the detention unlawful. The Respondent's position that Mr. Tellez' detention was indeed lawful was not based on substantial evidence; ICE agents erroneously detained Mr. Tellez without a bond hearing. *See 28 U.S.C. § 2241.* The Court granted his ***Petition for a Writ of Habeas Corpus***.

This decision directly benefits Mr. Tellez because it resulted in his release from immigration detention after the Court ordered that he be provided a prompt, individualized bond hearing or be released from custody. [D.E.13] Thus, this Court on **February 26, 2026** order conferred prevailing party status. See, e.g., *W.M.V.C. v. Barr*, 926 F.3d 202, 208 n.2 (5th Cir. 2019) ("Because petitioners sought a remand to the BIA, our decision to grant such relief . . . entitles petitioners to prevailing party status.").

B. The Government's Position Was Not Substantially Justified

The government's position in this case was not "substantially justified." 28 U.S.C. § 2412(d)(1)(A). Congress placed a heavy burden of proof on the government to demonstrate that its position was substantially justified. H.R. Rep. No. 96-1418, 96th Cong., 2d Sess. 10, 13-14 (1980) ("[T]he strong deterrents to contesting government action require that the burden of proof rest with the government."). To meet this burden, the government must show that its position had a reasonable basis both in law and in fact. *Pierce v. Underwood*, 487 U.S. 552, 566 n.2 (1988); W.M.V.C., 926 F.3d at 209-10 (quoting *Baker v. Bowen*, 839 F.2d 1075, 1080 (5th Cir. 1988). The government must meet this threshold twice (2) —with regard to the agency action giving rise to the litigation and its litigation positions. 28 U.S.C. § 2412(d)(2)(D); *Herron v. Bowen*, 788 F.2d 1127, 1130 (5th Cir. 1986). If it cannot do both, the Court must award fees. This Court reviews the government's position under a "totality of the circumstances" approach. W.M.V.C., 926 F.3d at 209-10.

1. The agency's pre-litigation position was not substantially justified

The agency's pre-litigation position was not justified, let alone substantially justified. The Immigration Judge [hereinafter, the "IJ"] denied Petitioner's Motion for Bond Redetermination, classifying Petitioner as an 'applicant for admission' under INA § 235 and concluding that the court lacked jurisdiction to consider bond. This determination was legally erroneous and reflects a fundamental misapplication of controlling law. By denying the motion solely on that classification, Petitioner was not afforded any meaningful, individualized assessment of Petitioner's risk of flight or potential danger to the community, as required under INA § 236(a).

2. The government's litigation position was not substantially justified

The government's litigation position was also unreasonable. In their Response, Respondents argued that Petitioner was properly classified as an applicant for admission subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A), and that discretionary detention under 8 U.S.C. § 1226(a) was inapplicable, relying in part on the Board of Immigration Appeals' [hereinafter, the "BIA"] decision in *Matter of Yajure-Hurtado*. Respondents further contended that Petitioner's detention was lawful in ongoing removal proceedings, that release was only available through parole under 8 U.S.C. § 1182(d)(5), that relevant case law cited by Petitioner was inapplicable, and that Petitioner's due process rights had not been violated. Based on these arguments, Respondents asserted that the Petition should be denied in its entirety.

Respondents' position was not substantially justified because it relied on an overly rigid and legally erroneous interpretation of the statutory framework governing immigration detention, improperly foreclosing the application of 8 U.S.C. § 1226(a) and ignoring controlling authority requiring an individualized assessment of detention.

By maintaining that Petitioner was categorically ineligible for a bond hearing and that detention could only be challenged through parole, Respondents failed to account for well-established due process principles and governing precedent recognizing the necessity of individualized review, thus directly resulting in Petitioner's prolonged and illegal detention. As reflected in the Court's adoption of the Magistrate Judge's recommendation and grant of *habeas* relief, Respondents' arguments lacked a reasonable basis in law and fact.

The Court expressly rejected Respondents' core argument that Petitioner's detention was governed by 8 U.S.C. § 1225(b)(2) rather than 8 U.S.C. § 1226(a). In the Report and Recommendation, the Magistrate Judge noted that '[t]his Court already has rejected Respondents' position' and cited multiple decisions within the Southern District of Florida and other jurisdictions rejecting the same statutory interpretation advanced by Respondents. The Court further explained that § 1225(b) applies primarily to noncitizens seeking entry into the United States, whereas § 1226(a) governs individuals already present in the country, like Petitioner.

Applying this framework, the Court concluded that Petitioner's detention was governed by § 1226(a), not § 1225(b)(2), and that Petitioner was therefore entitled to an individualized bond hearing before an immigration judge. In reaching this conclusion, the Court emphasized that Respondents' interpretation conflicted with the statutory text, legislative history, and the weight of persuasive authority from courts across the country.

The District Court likewise rejected Respondents' arguments in full. After conducting a de novo review of the Report and Recommendation, the parties' briefing, and the record, the Court agreed with the Magistrate Judge's analysis and conclusions. The Court expressly overruled Respondents' objections and adopted the Report and Recommendation in its entirety, thereby rejecting Respondents' position that Petitioner's detention was governed by 8 U.S.C. § 1225(b)(2) and that no bond hearing was required.

In adopting the Report, the Court necessarily affirmed the conclusion that Petitioner's detention was governed by 8 U.S.C. § 1226(a) and that he was entitled to an individualized bond hearing. The Court then granted the Petition and ordered Respondents to provide Petitioner with a prompt, individualized bond hearing or release him.

The District Court's de novo review and rejection of Respondents' objections further confirm that Respondents' position lacked a reasonable basis in law and was not

substantially justified. These findings demonstrate that Respondents' position lacked a reasonable basis in law, as it relied on a statutory interpretation that had already been repeatedly rejected by courts within this District and elsewhere.

In sum, the government's position as a whole was unreasonable.

C. There Are No Special Circumstances That Would Make an Award Unjust

There are no special circumstances in this case that would make an award of attorneys' fees unjust. See 28 U.S.C. § 2412(d)(3). The burden of proving the special circumstances rests with the government. See, e.g., *Martin v. Heckler,* 754 F.2d 1262, 1264 (5th Cir. 1985); *Abela v. Gustafson*, 888 F.2d 1258, 1266 (9th Cir. 1989). The government is unable to do so in this case.

D. The Fees and Expenses Sought Are Reasonable

Counsel is submitting records documenting reasonable time spent working on the petition for review and on the instant motion, all of which is reimbursable. Exhibit B (Declaration of Matthew Meyers, with attached timesheets); *Comm'r, INS v. Jean*, 496 U.S. 154, 163-65 (1990). This Court calculates hourly rates using the EAJA statutory rate ($125/hour) adjusted for inflation based on a cost-of-living adjustment using the Consumer Price Index for All Urban Consumers (CPI-U) for the year in which the work was performed. *Perales v. Casillas,* 950 F.2d 1066, 1076-77 (5th Cir. 1992). Provided as **Exhibit C** is the Consumer Price Index (CPIU) for Miami, FL. See U.S.

Dept. of Labor, Bureau of Labor Statistics, [to locate the relevant CPI-U, go to: https://www.bls.gov/bls/news-release/cpi.htm] (last visited March 30, 2026). Based on these statistics, the CPI-U for services in the region where this case was litigated was 2.4 in 2026, when Mr. Tellez prevailed. ***See Exhibit B.*** As such, adjusting EAJA's statutory rate to account for inflation results in an hourly rate of $262.36 per hour for each billing attorney.

In addition, provided as **Exhibit D** is a summary of the hours and rates, as well as expenses, for which compensation is requested. The total award sought is $4,753.94 at this point, but Mr. Tellez will seek additional fees if the government opposes this motion and counsel must draft a reply.

IV. CONCLUSION

The Court should grant $4,753.94 in fees and expenses in addition to fees for any time spent preparing a reply brief if the government opposes this motion. [3]

Respectfully submitted,

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Attorney for Respondent

[3] Freddy Antonio Tellez Lopez has assigned the payment of fees to undersigned counsel. See ***Exhibit A*** (Declaration of Freddy Antonio Tellez Lopez).

CERTIFICATE OF SERVICE

I, Matthew Meyers, hereby certify that on April 24, 2026 I caused the foregoing motion to be electronically filed with the Clerk of the Court for the United States Court of Appeals for the 11th Circuit using the Court's appellate CM/ECF system. Respondent's counsel is a registered CM/ECF user and will be served via the Notice of Docket Activity through this Court's CM/ECF system.

s/MATTHEW MEYERS
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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(g)(1), I certify that this motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A), because it contains 2,081 words, excluding the parts of the motion exempted by Fed. R. App. P. 32(f).

s/MATTHEW MEYERS
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Attorney for Respondent

INDEX OF EXHIBITS

A. Declaration of Freddy Antonio Tellez Lopez

B. Declaration of Matthew Meyers and accompanying time sheets from Major Case Law Group.

C. Consumer Price Index data for Miami, FL which forms the basis of the calculation of hourly rate requested

D. Statement of Total Amount of Fees

EXHIBIT A

DECLARATION OF FREDDY ANTONIO TELLEZ LOPEZ

I, Freddy Antonio Tellez Lopez, hereby declare and state:

1. My current residence is [redacted]
2. I am a private individual and my net worth does not, nor has it ever, exceeded the amount of $2,000,000.
3. I make this declaration in support of my motion for attorney fees and costs incurred in my successful representation before the United States District Court Southern District of Florida in *Freddy Antonio Lopez Tellez v. Marcos Charles et al.* Case No. 0:26cv60206.
4. I previously retained Matthew Meyers to represent me in this case.
5. I authorize the recovery of fees and expenses to my attorney's office in order to compensate them for work performed on my behalf.
6. I further assign payment of any award of fees and costs to Major Case Law Group and request payment to Major Case Law Group at 2100 W Flagler St. Miami, FL 33135 or directly deposited into the office's account.
7. To the best of my knowledge, I do not owe any debt to the United States federal government.

I declare under penalty of perjury under the laws of the State of Florida that the above is true and correct to the best of my knowledge and belief. Executed on April 24th, 2026 at Miami, FL.

/s/Freddy Tellez Lopez
Freddy Tellez Lopez

EXHIBIT B

DECLARATION OF MATTHEW MEYERS

I, Matthew Meyers, hereby declare and state:

1. I am a Partner in Major Case Law Group in Miami, FL. My firm represented Mr. Tellez in a ***Petition for Writ of Habeas Corpus*** Case No. 0:26cv60206.
2. In addition to myself, two paralegals worked on the petition for review. The attached timesheet is an itemization of the time spent by us in litigating the petition and preparing a motion for attorneys' fees and costs. These hours were taken contemporaneously and are true and correct to the best of my knowledge. If the government opposes the motion for attorneys' fees and costs, then additional hours will be submitted representing any time spent on a reply.
3. I have calculated the hourly statutory rate for attorneys based on the $125 hourly rate under the Equal Access to Justice Act (EAJA), adjusted for inflation. In calculating the hourly rate adjusted for inflation, I employed the following formulas:

$$\frac{\$125 \times \text{CPI-U for year 2026}}{155.7}$$

4. In the formulas above, $125 represents the hourly statutory rate under EAJA. The CPI-U represents that Consumer Price Index for All Urban Consumers (CPI-U) published by the U.S. Bureau of Labor Statistics for the Miami, FL region, which was 326.785 for 2026, the year in which work was performed.

The number 155.7 represents the CPI-U in March 1996, when Congress set the $125 statutory hourly rate of attorney compensation.

5. Using the formulas in paragraph 3, the hourly statutory rate for attorneys in 2026 is $262.36.

I declare under penalty of perjury under the laws of the State of FL that the above is true and correct to the best of my knowledge and belief. Executed on April 24, 2026 at Miami, FL.

s/MATTHEW MEYERS
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EXHIBIT C

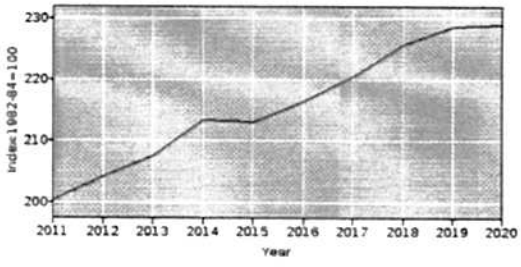
CPI-U Miami-Fort Lauderdale-West Palm Beach, FL

Change Output Options: From: 2016 To: 2026 GO

☑ include graphs ☐ include annual averages More Formatting Options ➡

a. CPI for All Urban Consumers (CPI-U)

Series Id: CUURS35BSA0
Not Seasonally Adjusted
Series Title: All items in Miami-Fort Lauderdale-West Palm Beach, FL, all urban consumers, not seasonally adjusted
Area: Miami-Fort Lauderdale-West Palm Beach, FL
Item: All items
Base Period: 1982-84=100



Download: xlsx

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2011		197.224		201.624		201.309		202.445		201.398		200.477	200.495	199.480	201.509
2012		204.291		206.088		204.829		203.959		204.139		202.477	204.213	204.705	203.721
2013		205.716		207.506		207.882		208.575		207.788		209.814	207.574	206.583	208.564
2014		211.745		213.309		214.668		214.102		214.791		212.169	213.365	212.835	213.895
2015		210.283		212.439		213.896		214.652		214.569		212.936	213.039	211.926	214.152
2016		214.505		215.513		217.305		216.582		218.200		217.758	216.414	215.237	217.592
2017		219.061		219.852		220.805		221.255		223.213		221.568	220.657	219.513	221.800
2018		224.711		225.116		227.393		226.307		228.070		226.557	225.927	224.763	227.091
2019		226.804		229.261		229.316		229.423		230.041		228.765	228.799	228.124	229.474
2020		230.147		226.387		228.898		228.978		229.885		230.388	229.161	228.580	229.742
2021		232.442		236.604											

EXHIBIT D

***Freddy Antonio Lopez Tellez v. Marcos Charles et al.* No. 0:26cv60206.**

Statement of Total Amount of Fees and Costs

2026

Timekeeper	**Total Hours**	**Hourly Rate**	**Total Fees**
Matthew Meyers	10.0	$262.36	$2,623.60
Paralegal	23.4	$75.00	$1,755.00
	Number		
Costs			
Filing Fees	$5.00		
Mileage	$361.34		
Total Fees and Costs	**$4,753.95**		

FREDDY ANTONIO TELLEZ LOPEZ

Type	Date	Hours	Description	Rate ($)	Billable ($)	User	Expense category
TimeEntry	12/16/2025	1.2	Evidence Gathering - Habeas Corpus. Conducted two telephonic conferences with the detainee's sister to obtain character recommendation letters and supplemental documentation. Contacted immigration counsel to secur	75.0	90.0	Admin Admin	
TimeEntry	12/18/2025	0.3	Legal research and call attempts to county records office to obtain client's criminal history.	75.0	22.5	Admin Admin	
TimeEntry	12/20/2025	0.8	Drafting points for Habeas.	75.0	60.0	Admin Admin	
TimeEntry	12/20/2025	0.2	Telephonic conference with client's sister and Attorney Meyers.	500.0	100.0	Matthew Meyers	
TimeEntry	12/23/2025	0.2	Consultation with supervising paralegal regarding final steps for Habeas Corpus petition.	75.0	15.0	Admin Admin	
TimeEntry	12/23/2025	0.4	Legal research on Doe v. Baker County and related precedents applicable to petition.	75.0	30.0	Admin Admin	
TimeEntry	12/23/2025	0.6	Drafted argument for Legal Statement on Habeas, based on 5th Amendment violation.	75.0	45.0	Admin Admin	
TimeEntry	01/06/2026	0.6	Reviewed Attorney Meyers' revisions and corrections to Habeas Corpus draft; implemented corrections and researched proper respondents for the petition.	75.0	45.0	Admin Admin	
TimeEntry	01/13/2026	0.7	Finalized citation subtexts and minor editorial corrections throughout petition draft; submitted to Attorney Meyers for review.	75.0	52.5	Admin Admin	
TimeEntry	01/19/2026	0.3	Translated Habeas Corpus petition into Spanish for client's review.	75.0	22.5	Admin Admin	
TimeEntry	01/26/2026	0.5	Assisted Counsel with the final compilation and filing of the Petition for Writ of Habeas Corpus. Processed and indexed individual evidentiary exhibits to ensure compliance with filing standards. Revised the Cover Letter and I	75.0	37.5	Admin Admin	
TimeEntry	01/02/2026	0.2	Forwarding all information received from attorney Cayetano regarding Freddy Tellez's immigration case.	75.0	15.0	Admin Admin	
TimeEntry	01/22/2026	1.2	Correcting habeas on Zoom with Case manager and assigned paralegal to case.	75.0	165.0	Admin Admin	
TimeEntry	02/04/2026	0.3	Telephonic conference with Cayetano Law Office to obtain background information and collect client's complete file.	75.0	22.5	Admin Admin	
TimeEntry	02/25/2026	0.3	Telephonic conference with client to discuss bond return process and request next steps.	75.0	22.5	Admin Admin	
ExpenseEntry	02/06/2026	84.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip (02.06.26)	0.725	60.9	Admin Admin	Mileage 2024
ExpenseEntry	02/16/2026	1.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip (02.16.2026)	56.84	56.84	Admin Admin	Mileage 2024
ExpenseEntry	02/17/2026	84.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip (02.17.2026)	0.725	60.9	Admin Admin	Mileage 2024
ExpenseEntry	02/11/2026	84.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip 02.11.2026	0.725	60.9	Admin Admin	Mileage 2024
ExpenseEntry	02/09/2026	84.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip 02.09.2026	0.725	60.9	Admin Admin	Mileage 2024
ExpenseEntry	02/04/2026	84.0	Mileage expense -- travel to Broward Transitional Carrier for client visit, round trip 02.04.2026	0.725	60.9	Admin Admin	Mileage 2024
TimeEntry	02/23/2026	0.5	Reviewed attorney comments on petition, applied corrections as directed.	75.0	37.5	Admin Admin	
TimeEntry	02/20/2026	0.5	Reviewed Response to DHS Opposition to Petition for Writ of Habeas Corpus.	500.0	250.0	Matthew Meyers	
TimeEntry	02/16/2026	0.7	Client visit at BTC to discuss case updates. Explained to client DHS response and what our strategy is moving forward.	75.0	52.5	Admin Admin	
TimeEntry	02/16/2026	2.5	Drafted response to DHS regarding Fifth Circuit legal argument on Habeas Corpus petition.	75.0	187.5	Admin Admin	
TimeEntry	02/17/2026	0.5	Client visit at BTC to discuss case status. Client signed documents for records and information release and asked status on his work permit and license.	75.0	37.5	Admin Admin	
TimeEntry	02/11/2026	0.4	Client visit at BTC to discuss case status. Client requested information on his Habeas petition and for a time range of response.	75.0	30.0	Admin Admin	
TimeEntry	02/09/2026	0.5	Client visit at BTC to discuss case status. Client requested we provide his family with any updates and asked if we had the information about the assigned judge. Discussed possibility of other reliefs.	75.0	37.5	Admin Admin	
TimeEntry	02/04/2026	0.7	Client visit at BTC to discuss case status. Client requested copy of Habeas Corpus petition, discussed possible outcomes, and answered all his questions regarding the process.	75.0	52.5	Admin Admin	
TimeEntry	02/04/2026	1.0	Reviewed and conducted research on Reply to DHS Opposition to Habeas Corpus Petition.	75.0	75.0	Admin Admin	
TimeEntry	02/03/2026	1.0	Reviewed orders from Southern District and began drafting response to DHS	75.0	75.0	Admin Admin	
TimeEntry	02/03/2026	1.3	Case law research regarding all decisions quotes on the case and began drafting legal arguments	75.0	97.5	Admin Admin	
TimeEntry	01/23/2026	1.2	Reviewed and restructured Habeas Corpus with attorney's corrections.	75.0	90.0	Admin Admin	
TimeEntry	02/04/2026	0.3	Reviewed filed from Cayetano Law Office and gave paralegal instructions on how to proceed.	500.0	150.0	Matthew Meyers	
TimeEntry	01/09/2026	0.4	Reviewed Habeas Corpus petition draft; provided written comments and corrections to paralegal.	500.0	200.0	Matthew Meyers	
TimeEntry	01/22/2026	1.5	Zoom conference with Case Manager and assigned paralegal to review and correct Habeas Corpus petition draft.	500.0	750.0	Matthew Meyers	
TimeEntry	01/22/2026	0.8	Reviewed and forwarded all documentation received from Attorney Cayetano regarding client Freddy Tellez's immigration proceedings to legal team.	500.0	400.0	Matthew Meyers	
TimeEntry	02/13/2026	0.3	Reviewed subtext citation and additional corrections made by paralegal	500.0	150.0	Matthew Meyers	
TimeEntry	02/06/2026	0.5	Reviewed and made corrections to Habeas Corpus petition draft	500.0	250.0	Matthew Meyers	
TimeEntry	12/31/2025	1.3	Drafted legal arguments for petition and added revisions for 5th Amendment violations	500.0	650.0	Matthew Meyers	
TimeEntry	12/20/2025	1.0	Drafted initial arguments for Habeas Corpus	500.0	500.0	Matthew Meyers	
TimeEntry	12/18/2025	0.5	Strategy meeting with paralegal and case manager for Mr. Tellez' Habeas Corpus Petition. Provided paralegal with case law research instructions and additional points that needed to be addressed	500.0	250.0	Matthew Meyers	
TimeEntry	02/05/2026	0.3	Reviewed visit notes from paralegal and provided instructions for upcoming visits	500.0	150.0	Matthew Meyers	
TimeEntry	02/03/2026	0.8	Reviewed issued orders and initial draft response for reply	500.0	400.0	Matthew Meyers	
TimeEntry	02/03/2026	0.3	Reviewed case law and judicial decisions relevant to court response.	500.0	150.0	Matthew Meyers	
TimeEntry	01/23/2026	0.5	Reviewed and restructured Habeas Corpus petition; made additional corrections and revisions.	500.0	250.0	Matthew Meyers	
TimeEntry	02/06/2026	0.5	Client visit at BTC to discuss case strategy. Explained to him how bond must be paid and what his release might look like. Client understood the firm has done all due diligence regarding the payment of his bond.	75.0	37.5	Admin Admin	
TimeEntry	02/16/2026	0.3	Met with paralegal to discuss matters to explain during visit to client and additional instructions.	500.0	150.0	Matthew Meyers	
TimeEntry	02/23/2026	0.2	Meeting with Attorney Meyers regarding filing via PACER	75.0	15.0	Admin Admin	