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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF TEXAS
12 SAN ANTONIO DIVISION

13 CHANCHAL SINGH,

14 Petitioner,

15 v.

16 KRISTI NOEM, in her official capacity as
17 Secretary of Homeland Security;

18 TODD LYONS, in his official capacity as
19 Acting Director of U.S. immigration and
20 Customs Enforcement; and

21 PAMELA BONDI, in her official capacity
22 as Attorney General of the United States,

23 MIGUEL VERGARA, in his official
24 capacity as Director of the San Antonio
25 Field Office of ICE, Enforcement and
26 Removal Operations, and

27 WARDEN, Karnes County Immigration
28 Processing Center,

Respondents.

Case No. 5:26-cv-00681-FB

**PETITIONER'S MOTION TO ENFORCE
THE COURT'S MARCH 12, 2026, ORDER
AND FOR ORDER TO SHOW CAUSE**

INTRODUCTION

Petitioner Chanchal Singh respectfully moves the Court to reopen this matter for the limited purpose of enforcing its March 12, 2026, Order, requiring Respondents to show cause why they

1 should not be held in civil contempt, and ordering Mr. Singh's immediate release. Petitioner
2 respectfully requests expeditious consideration in light of the ongoing detention at issue.

3 Counsel for Petitioner conferred in a good faith attempt to resolve this matter by emailing
4 Respondents' counsel on April 15, 2026, leaving a voicemail for AUSA Latasha May on April 16,
5 2026, and sending a follow-up email on April 16, 2026. No response was received before filing, so
6 no agreement could be made.

7
8 This motion can and should be granted on the timeliness violation alone. The Court ordered
9 Respondents, on or before March 18, 2026, either to provide Mr. Singh with a bond hearing or
10 release him. Respondents did neither. DHS itself told the immigration court on March 18 that the
11 district court required a hearing "be held by March 18, 2026," yet no hearing occurred until March
12 20. Exh. D at 14; Exh. C at 11. Respondents then admitted to this Court that the hearing took place
13 "two days after the Court ordered the bond hearing to occur" because ICE mistakenly believed the
14 deadline was March 23.

15
16 Even if a late hearing could matter after the deadline passed, the March 20 proceeding still
17 did not satisfy the Court's Order. The transcript shows that, after hearing only DHS's generic flight-
18 risk presentation and asking a few questions about assets and ties, the IJ stated he was "persuaded
19 by the government's presentation on flight risk" and would "deny on flight risk grounds." Exh. A
20 at 4. Only then did counsel ask leave to 'articulate [his] arguments for the record,' including that
21 Mr. Singh had never missed a hearing, had complied with release conditions for years, and that
22 DHS already held his passport. ECF No. 7 at 2. A hearing is not meaningful where the adjudicator
23 announces the outcome before hearing the respondent's principal response.

24
25 The written order underscores the same defect. It does not begin by stating that DHS carried
26 its burden and identifying the evidence supporting that conclusion. Instead, it begins: "Denied,
27 because DHS must comply with Judge Biery's Order, dated March 12, 2026." Exh. B at 8. Only
28

1 “alternatively” does it state a flight-risk conclusion. *Id.* That structure matters. The IJ did not treat
2 the March 20 proceeding as a straightforward bond denial that cured DHS’s default. Rather, the IJ
3 recognized that DHS still had to comply with Judge Biery’s Order, and stated a flight-risk denial
4 only in the alternative. That confirms that even the immigration judge understood the federal order
5 remained unsatisfied. The Court should enforce its Order and order immediate release.
6

7 RELEVANT BACKGROUND

8 On March 12, 2026, the Court granted the habeas petition in part and ordered that, “on or
9 before March 18, 2026,” Respondents must either: “(1) provide Petitioner Chanchal Singh with a
10 bond hearing before an immigration judge, at which Respondents shall bear the burden of
11 justifying, by clear and convincing evidence of dangerousness or flight risk, Petitioner’s continued
12 detention; or (2) release Petitioner Chanchal Singh from custody, under reasonable conditions of
13 supervision.” ECF No. 7 at 6.
14

15 Respondents’ own filings eliminate any ambiguity about the deadline. On March 18, DHS
16 told the immigration court that the district court had required a bond hearing “be held by March 18,
17 2026” and asked that the hearing be set “as soon as possible.” Exh. D at 14. Respondents later
18 admitted to this Court that the hearing actually occurred on March 20, “two days after the Court
19 ordered the bond hearing to occur,” because ICE mistakenly believed the deadline was March 23.
20 ECF No. 9 at 1.
21

22 The Court further ordered that, if Mr. Singh had not been released, Respondents must, by
23 March 23, 2026, inform the Court whether and when a bond hearing was held in accordance with
24 that directive and set out “in detail” the reasons for any adverse decision. *Id.* The Court also
25 expressly cautioned that a proceeding in which bond was denied for lack of jurisdiction would not
26 satisfy the Order and that immediate release would then be required. *Id.*
27

28 In the same Order, the Court recounted that DHS initially released Mr. Singh in January

1 2022 and that, for more than three years thereafter, he “complied with the conditions of release and
2 continued to litigate his immigration case with removal proceedings ongoing.” *Id.* at 2. By the time
3 of the March 20 hearing, Mr. Singh had been present in the United States and compliant with his
4 reporting requirements for over four years.

5
6 Respondents did not hold any hearing by March 18. Instead, on March 18, 2026, DHS filed
7 a motion in the Pearsall Immigration Court acknowledging that the district court had ordered a bond
8 hearing “be held by March 18, 2026” and asking that the hearing be set “as soon as possible.” Exh.
9 D at 14. Also on March 18, the immigration court issued a notice setting the custody
10 redetermination hearing for March 20, 2026, at 9:00 a.m., two days after the Court’s deadline. Exh.
11 C at 11.

12
13 On March 23, 2026, Respondents filed their advisory to this Court. They admitted that the
14 hearing occurred on March 20, 2026, “two days after the Court ordered the bond hearing to occur,”
15 and further admitted that ICE “erroneously believed the bond deadline to be March 23, 2026,
16 instead of March 18, 2026” because of “a clerical error on behalf of the agency.” ECF No. 9 at 1.

17
18 The March 20 hearing transcript confirms that the immigration judge understood that the
19 district court’s habeas order “shifts a burden to the department.” Exh. A at 2-3. DHS nevertheless
20 elected to proceed only on flight risk and offered a bare oral argument: Mr. Singh entered in 2022,
21 lacked lawful status, had been ordered removed, had lost his merits case, and, if his appeal were
22 denied, would be subject to immediate removal. *Id.* at 3. Petitioner had also submitted a bond
23 evidentiary packet designated as Bond Exhibit 2, including sponsor documents, identification
24 documents, an article regarding alternatives to detention, and documents reflecting his U.S. ties.
25 Exh. E, at 24-26.

26
27 Before counsel was allowed to articulate Petitioner’s main response, the immigration judge
28 announced his ruling. After questioning counsel about assets and family ties, the judge stated: “So

1 I am persuaded by the government's presentation on flight risk . . . I'm gonna deny on flight risk
2 grounds." Exh. A at 4.

3 Only then did counsel ask, "Your honor may I just articulate my arguments for the record?"
4 *Id.* Counsel then explained that Mr. Singh had been in the United States since January 2022, more
5 than four years by the time of the hearing, and had not had any brushes with the law, had not missed
6 a hearing, and that his behavior did not suggest he would abscond. Counsel also pointed out that
7 Mr. Singh's passport was already in DHS custody and that "the government has not filed a single
8 shred of paper to show that he is a flight risk." *Id.*

9
10 The immigration judge nonetheless adhered to his earlier conclusion and issued a written
11 order stating: "Denied, because DHS must comply with Judge Biery's order, dated March 12, 2026.
12 Alternatively, the respondent is a significant flight risk and no bond amount will ensure his
13 appearance at future hearings." Exh. B at 8. Notably, the judge closed the hearing by stating: "[M]y
14 intent here is in no way to violate or go against Judge Biery's order." Exh. A at 5.

15 ARGUMENT

16 A. Respondents Violated a Clear and Specific Court Order.

17
18 Civil contempt is established by clear and convincing evidence that a court order was in
19 effect, the order required specified conduct, and the respondent failed to comply. *American*
20 *Airlines, Inc. v. Allied Pilots Ass'n*, 228 F.3d 574, 581 (5th Cir. 2000). Willfulness is unnecessary;
21 actual noncompliance is enough. *Id.*

22
23 Respondents violated a definite and specific order. The Court ordered them, "on or before
24 March 18, 2026," either to provide a bond hearing or release Mr. Singh. ECF No. 7 at 6.
25 Respondents did neither. DHS itself told the immigration court on March 18 that the district court
26 required a hearing "be held by March 18, 2026." Exh. D at 14. Yet the hearing was not held until
27 March 20. Respondents later admitted to this Court that the hearing occurred "two days after the
28

1 Court ordered the bond hearing to occur” because ICE mistakenly believed the deadline was March
2 23. ECF No. 9 at 1.

3 That is enough to establish noncompliance. A hearing held on March 20 is not a hearing
4 held “on or before March 18.” Nor does a late hearing retroactively cure the missed deadline. The
5 Court’s order was conditional: by March 18, Respondents had to hold the hearing or release Mr.
6 Singh. Once March 18 passed without either event, the Order required release.
7

8 **B. Even if the Late March 20 Proceeding Matters, It Still Did Not Satisfy the Court’s**
9 **Order.**

10 A court enforcing a prior habeas order may review whether the resulting bond hearing was
11 “fundamentally unfair.” *Morgan v. Oddo*, No. 3:25-cv-221, 2025 U.S. Dist. LEXIS 181706, at *8-
12 *10 (W.D. Pa. Sept. 16, 2025). Due process in this setting requires, at minimum, a meaningful
13 opportunity to present evidence and argument and an individualized determination. *Id.* (quoting
14 *Ghanem v. Warden Essex Cnty. Corr. Facility*, No. 21-1908, 2022 U.S. App. LEXIS 5092, at *2
15 (3d Cir. Feb. 25, 2022)). The March 20 proceeding failed on both fronts.
16

17 **1. The IJ Announced the Outcome Before Hearing Petitioner’s Principal**
18 **Response.**

19 This was not a meaningful opportunity to be heard because the outcome was announced
20 before the defense was heard. “Before the ruling, counsel tried to explain the threshold posture of
21 the hearing: Judge Biery’s Order required either a hearing by March 18 or release. The IJ dismissed
22 that point as a matter between counsel and DHS and immediately pivoted to why the government
23 makes it a strong argument on flight risk. Exh. A at 3.
24

25 Moments later, after hearing only DHS’s short, generic submission and asking a few
26 questions about assets and ties, the IJ stated: “So I am persuaded by the government’s presentation
27 on flight risk” and “I’m gonna deny on flight risk grounds.” Exh. A at 4. Only after that
28

1 announcement did counsel ask, “Your honor may I just articulate my arguments for the record?”
2 *Id.* A hearing is not meaningful where the adjudicator announces the outcome first and hears the
3 respondent’s central rebuttal only afterward as a post hoc proffer.

4 The omitted-before-ruling points were not peripheral. Counsel then explained that Mr.
5 Singh had been in the United States since January 2022, had not had any “brushes with the law,”
6 had not missed a hearing, and that DHS already held his passport. Exh. A at 4. Counsel also
7 emphasized that the government had filed “not a single shred of paper” showing flight risk. *Id.*
8 Those were the strongest individualized facts against a flight-risk finding, and they were presented
9 only after the IJ had already announced the result.
10

11
12 **2. The Flight-Risk Finding Rested on Generic Status-Based Factors Common**
13 **to Nearly All Detainees, Not Individualized Proof.**

14 DHS presented no individualized evidence that Mr. Singh was likely to abscond. Its
15 submission consisted of generic factors: that he entered in 2022, lacks lawful status, had been
16 ordered removed by an immigration judge, and would be removable if his appeal failed. Exh. A at
17 3. Those facts do not amount to clear and convincing evidence that this respondent is a flight risk—
18 especially where the record also showed years of compliance with release conditions, no missed
19 hearings, and DHS’s possession of his passport. ECF No. 7 at 2.

20 Other recent decisions have correctly held that a bond hearing fails due process when an
21 immigration judge relies on considerations that would lead to automatic denials in most cases or
22 on facts not rationally related to whether a petitioner is actually likely to abscond. *See Mejia v.*
23 *Crawford*, No. 1:26-cv-253 (LMB/LRV); 2026 U.S. Dist. LEXIS 63739, at *16-*19 (E.D. Va. Mar.
24 25, 2026); *Fuentes v. Bondi*, 1:26-cv-167 (AJT-WEF), 2026 U.S. Dist. LEXIS 65037, at *4-*8
25 (E.D. Va. Feb. 24, 2026). The judge’s stated reasons here track the same impermissible pattern.
26 The judge emphasized that Mr. Singh had entered in 2022, lacked lawful status, had no property or
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28

1 significant family ties, and had already lost his merits case so success on appeal would be
2 “speculative.” Exh. A at 4. But Bond Exhibit 2 included, among other things, a sponsor affidavit
3 from a lawful permanent resident offering housing and support, a copy of the sponsor’s permanent
4 resident card, and documents reflecting Mr. Singh’s U.S. ties. Exh. E at 28-29, 65-109.

5
6 Those reasons are inadequate. Every detainee who appears for a section 1226(a) bond
7 hearing lacks lawful status. Many have been denied some form of relief. Many do not own property
8 or have immediate family with permanent status. Treating those common conditions as the decisive
9 proof of flight risk would collapse discretionary detention into a near-automatic rule of detention.
10 That is exactly the concern the BIA recognized decades ago in *Matter of Patel*, where it held that
11 overstaying a visa and the denial of a visa petition “bear little if any relevance” to whether a
12 noncitizen is likely to appear and warned that an overly broad view of such “adverse factors” could
13 require bond in “almost every” case. 15 I&N Dec. 666, 667 (BIA 1976).

14
15 Indeed, where an immigration judge’s written order does no more than announce a flight-
16 risk conclusion without articulating the evidence underlying it, courts have found that the hearing
17 failed due process. *See Mejia v. Bondi*, No. 26-1592, 2026 U.S. Dist. LEXIS 55686, at *4–*8
18 (D.N.J. Mar. 17, 2026) (granting immediate release where IJ’s written denial stated only “Denied
19 because Respondent is a flight risk” without specific findings; court held the written order failed to
20 demonstrate the individualized determination due process requires). The IJ’s written order in this
21 case is similarly conclusory. Exh. B at 8.

22
23 Nor did the government identify any truly individualized evidence pointing to
24 nonappearance. There was no claim that Mr. Singh had ever missed an immigration hearing, ever
25 violated a reporting condition, ever attempted to flee, or ever committed a crime. To the contrary,
26 the record described in the Court’s March 12 Order reflects that Mr. Singh complied with release
27 conditions for more than three years before DHS re-detained him. ECF No. 7 at 2. By the date of
28

1 the hearing, that compliance record stretched over four years. Counsel reminded the immigration
2 judge that Mr. Singh had not missed a hearing and had not had any “brushes with the law.” Exh. A
3 at 4.

4 Two additional uncontested facts in the record directly refute the government’s flight-risk
5 submission, and neither is addressed in the IJ’s written order. First, DHS already held Mr. Singh’s
6 passport at the time of the hearing. Exh. A at 4. A detainee whose travel documents are in the
7 government’s own possession cannot depart internationally on his own identity; the government’s
8 possession of the passport is a concrete, individualized check on the most serious form of flight
9 risk. Second, Mr. Singh had years of compliance, including attending all required hearings. ECF
10 No. 7 at 2. The written order does not mention the passport or the four-year compliance record.
11 Exh. B at 8.

12 Respondents may argue that the likelihood of relief may sometimes be considered. *See*
13 *Matter of R-A-V-P-*, 27 I. & N. Dec. 803, 805 (BIA 2020). Petitioner does not contend otherwise.
14 The problem here is that the bare denial of relief, combined with status-based factors common to
15 many detainees, was used as a substitute for actual proof of likely nonappearance. That is a different
16 case from those in which courts have found additional, concrete evidence supporting flight risk,
17 such as a history of missed court appearances or criminal noncompliance. *See, e.g., Chuma v. FCI*
18 *Berlin*, No. 26-cv-159-LM-AJ, 2026 U.S. Dist. LEXIS 62983, at *8 (D.N.H. Mar. 25, 2026)(finding
19 a reasonable jurist could have concluded by a preponderance that Petitioner posed a flight risk when
20 he “had been charged at least five times with driving without a license or on a suspended license,
21 and that he had missed several court dates in connection with those charges” and had “twice ...
22 violated the terms of his probation.”). No such evidence existed here.

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27 **3. The Hearing Effectively Reversed the Burden of Proof This Court Imposed.**
28

1 Although the IJ correctly recognized that Judge Biery's order "shifts a burden to the
2 department," the hearing itself shows that burden slipping back to Mr. Singh. Exh. A at 2-3. DHS
3 offered no individualized documentary proof of flight risk. The hearing instead focused on what
4 Mr. Singh could not show, property, assets, and qualifying family ties. *Id.* at 3. That is not
5 Respondents carrying their burden by clear and convincing evidence; it is generic reasoning and
6 absence-of-defense reasoning substituting for actual proof.
7

8 Moreover, it is burden-shifting. Courts have repeatedly held that section 1226(e) does not
9 authorize immigration judges to disregard a court-ordered or constitutionally required allocation of
10 proof. *See, e.g., Hernandez-Lara v. Lyons*, 10 F.4th 19, 41 (1st Cir. 2021); *Donouvo*, 2026 U.S.
11 Dist. LEXIS 58341, at *5-*6 (holding that a hearing at which the IJ denied bond because the
12 respondent had not met his burden "does not qualify" as compliance with the habeas order); *G.F.F.*
13 *v. Francis*, 2025 U.S. Dist. LEXIS 221779, at *8-*12 (S.D.N.Y. Nov. 10, 2025) (applying *Mathews*
14 *v. Eldridge* and holding that placing the burden on the detained noncitizen violates due process).
15 The same principle applies here. Even if the transcript does not contain a verbal statement that the
16 burden rested on Mr. Singh, the substance of the hearing shows that the judge treated the absence
17 of affirmative proof from Mr. Singh as the reason to detain him.
18

19 The written order confirms the lack of lawful compliance. It states, first, that "DHS must
20 comply with Judge Biery's Order, dated March 12, 2026," and only "alternatively" that Mr. Singh
21 is a significant flight risk. Exh. B at 8. That formulation is telling. The IJ did not treat the March 20
22 proceeding as a straightforward bond denial that satisfied the federal court's command. Instead, the
23 IJ expressly recognized that DHS still had to comply with Judge Biery's Order, and stated a flight-
24 risk denial only in the alternative. In other words, even the immigration judge appears to have
25 understood that the March 20 proceeding did not itself cure DHS's failure to provide the hearing
26 ordered by March 18. The primary ruling is thus not an independent bond determination; it is a
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28

1 direction that DHS remain bound by the district court's Order. The alternative flight-risk conclusion
2 is just that, alternative. The IJ's closing statement reinforces this reading: "[M]y intent here is in no
3 way to violate or go against Judge Biery's Order." Exh. A at 5. That is not the language of an
4 adjudicator who believed the federal order had been fully satisfied.
5

6 **C. Section 1226(e) Does Not Bar This Court from Enforcing Its Own Order or**
7 **Reviewing Whether the Hearing Satisfied Due Process.**

8 Petitioner does not ask this Court to set bond or reweigh discretionary factors in the first
9 instance. He asks the Court to enforce its own conditional habeas order and to determine whether
10 the March 20 proceeding was timely and actually occurred in accordance with that order. Section
11 1226(e) does not strip this Court of that authority. The Supreme Court has made clear that section
12 1226(e) does not bar constitutional challenges to detention procedures. *Demore v. Kim*, 538 U.S.
13 510, 517 (2003); *Jennings v. Rodriguez*, 583 U.S. 281, 295 (2018). Those holdings control here:
14 Petitioner challenges the timeliness and fundamental fairness of the process, not the IJ's
15 discretionary weighing of bond factors.
16

17 That is precisely how courts have treated motions to enforce prior habeas orders. In *Morgan*,
18 the court held that, although it could not review the underlying discretionary bond decision, it
19 retained jurisdiction to review whether the bond hearing was "an individualized hearing" predicated
20 upon "fundamental due process principles." 2025 U.S. Dist. LEXIS 181706, at *15. In *Fuentes* and
21 *Mejia v. Crawford*, the Eastern District of Virginia rejected section 1226(e) objections and enforced
22 prior orders where immigration judges denied bond based on generic status-based or weakly
23 probative flight-risk considerations. *See Fuentes*, 2026 U.S. Dist. LEXIS 65037, at *4-*8; *Mejia*
24 *v. Crawford*, 2026 U.S. Dist. LEXIS 63739, at *8-*19. The Fourth Circuit has likewise explained
25 that section 1226(e) does not deprive federal courts of jurisdiction to review whether the procedures
26 and factors used in bond hearings are constitutionally compliant. *Miranda v. Garland*, 34 F.4th
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1 338, 352–54 (4th Cir. 2022).

2 The cases Respondents are most likely to cite are distinguishable. In *Pinto-Nunez v. Bondi*,
3 the district court rejected an enforcement motion because the petitioner offered no transcript or
4 detailed account showing any due-process defect and instead asked the court to second-guess the
5 IJ’s case-specific weighing of evidence. 2026 U.S. Dist. LEXIS 48513, at *7–*12 (D. Md. Mar.
6 10, 2026). *Grant-Davis v. DeAnda-Ybarra* is likewise inapposite because it treated a petition
7 framed as review of the IJ’s ultimate weighing of *Guerra* factors, not a motion enforcing a prior
8 order on the basis of specific, transcript-confirmed procedural defects. See 2026 U.S. Dist. LEXIS
9 62006, at *8–*18 (D.N.M. Mar. 23, 2026).

11
12 **D. Exhaustion Does Not Bar This Motion.**

13 Respondents may also argue that Mr. Singh must first appeal to the BIA. That argument
14 fails for two separate reasons. First, this is not a newly filed habeas petition challenging an ordinary
15 bond denial. The Court has already granted habeas relief in part and prescribed the procedure
16 Respondents had to follow. This motion seeks enforcement of that Order. In precisely that posture,
17 *Morgan* held that there was “nothing left for Petitioner to exhaust” because the writ had already
18 been conditionally granted and the petitioner was asking the district court to review compliance
19 with its own order. 2025 U.S. Dist. LEXIS 181706, at *8–*9. See also *Luciano-Jimenez v. Doll*,
20 543 F. Supp. 3d 69, 71 n.1 (M.D. Pa. 2021).

22 Second, even if some exhaustion principle could apply, it is prudential, not jurisdictional,
23 and it should be excused here. *Morgan*, 2025 U.S. Dist. LEXIS 181706, at *9–*10. The BIA cannot
24 retroactively make a March 20 hearing timely as of March 18. Nor can the BIA adjudicate civil
25 contempt of a district court order or supply the emergency release remedy this Court expressly
26 contemplated. Requiring Mr. Singh to remain detained while waiting for a bond appeal to be
27 processed would render the Court’s March 12 Order meaningless. See *Picado v. Hyde*, No. 26-cv-
28

06t5-JJM-PAS, 2026 U.S. Dist. LEXIS 27155, at *13-*14 (D.R.I. Feb. 9, 2026) (waiving exhaustion where requiring a detainee to await BIA review would prolong detention and undermine the effectiveness of habeas relief).

CONCLUSION

Respondents failed to comply with the Court's order when they neither held the required hearing nor released Mr. Singh by March 18—and that failure alone requires enforcement and release. The March 20 proceeding does not cure the violation. The IJ announced the outcome before hearing Mr. Singh's principal response, DHS relied on generic status-based factors rather than individualized proof, and the written order itself confirms that the proceeding was not the independent hearing the Court ordered. Exh. A at 3-5; Exh. B at 8.

PRAYER FOR RELIEF

For the reasons set out above, Petitioner respectfully requests that the Court:

1. reopen for the limited purpose of enforcement;
2. hold that Respondents failed to comply with the March 12 order because they did not hold the required hearing or release Mr. Singh on or before March 18;
3. hold that the March 20, 2026 proceeding did not satisfy the Court's March 12, 2026 Order, including because the IJ's own written order recognized that DHS still had to comply with that Order and stated any flight-risk ruling only in the alternative;
4. order Respondents to show cause why they should not be held in civil contempt for failure to comply with the Court's March 12, 2026, Order;
5. order immediate release under reasonable conditions of supervision, with notice to counsel of the exact location and exact time of release no less than two hours beforehand;

- 1 6. only in the alternative, order a new hearing before a different IJ within three days, with DHS
2 bearing the burden by clear and convincing evidence, and require a reasoned decision
3 identifying the evidence actually relied upon; and
4
5 7. award such other and further relief as the Court deems just and proper.

6
7 Respectfully submitted,

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16 COUNSEL FOR PETITIONER

17
18 By: /s/ Robert Urenda
19 Robert Urenda, Esq.
20 COUNSEL FOR PETITIONER

21 **CERTIFICATE OF CONFERENCE**

22 Counsel for Petitioner conferred with counsel for Respondents by emailing a copy of this
23 motion to latasha.may@usdoj.gov on April 15, 2026, requesting Respondents' position; leaving a
24 voicemail for AUSA May on April 16, 2026; and sending a follow-up email on April 16, 2026. No
25 response was received before filing, so no agreement could be made.

26 Dated this 18th day of April 2026.

27 /s/ Robert Urenda
28 Robert Urenda, Esq.

CERTIFICATE OF SERVICE

I certify that on April 18, 2026, I filed this motion through CM/ECF, which will serve all counsel of record.

Dated this 18th day of April 2026.

/s/ Robert Urenda
Robert Urenda, Esq.