

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

ERIK IVAN RODRIGUEZ FLORES,

Petitioner,

v.

Civil Action No. 3:26-cv-00338-DB

PAMELA BONDI, et. al

Respondents.

**PETITIONER'S SECOND SUPPLEMENTAL ADVISORY TO THE COURT
IN SUPPORT OF WRIT OF HABEAS CORPUS**

Petitioner Erik Iván Rodríguez Flores (“Mr. Rodríguez Flores”) files this Second Supplemental Advisory in response to the Court’s March 10, 2026 Order, ECF No. 14, and states as follows:

1. In response to the Court’s Order, dated March 10, 2026, ECF No. 14, Mr. Rodríguez Flores filed an Advisory with the Court on March 13, 2026, ECF No. 15, explaining why he had appeared unrepresented at both a master calendar immigration hearing and a bond hearing ordered by this Court, and setting forth available information regarding notice for both those hearings. Mr. Rodríguez Flores files this *second* supplement to bring to the Court’s attention a *second* bond hearing that occurred unexpectedly on March 13, 2026.

2. In the early hours of March 13, 2026, Mr. Rodríguez Flores was awakened by government personnel and told that he needed to be moved to a separate area because

he had immigration court the next day. He was not informed of the nature of the proceeding. Mr. Rodriguez Flores reports that he was moved immediately to a separate part of the facility.

3. Mr. Rodriguez Flores reports that the morning of March 13, 2026, he was taken to immigration court along with other detainees and that he ultimately appeared before an immigration judge for what he came to learn was a second bond hearing.

4. Neither Mr. Rodriguez Flores nor the undersigned received notice of this second bond hearing. Mr. Rodriguez Flores was unrepresented at this hearing.

5. Mr. Rodriguez Flores reports that a bond was denied for a second time and that the prosecutor and immigration judge strongly encouraged him to waive his appeal “because that was just going to extend his detention by 30 days.” Mr. Rodriguez Flores has been detained since January 7, 2026.

6. The undersigned do not have a copy of the immigration court’s March 13, 2026 order. Immediately upon learning of this second bond hearing, the undersigned requested that counsel for Respondents share the information about this hearing, including its purpose, when it was set, and why neither Mr. Rodriguez Flores nor counsel received advance notice of the hearing. As of this filing, counsel for Respondents has not responded to this request.

CONCLUSION

In sum, continued detention violates Mr. Rodriguez Flores’s constitutional due process rights. Requiring Mr. Rodriguez Flores to appear for a second bond hearing with no explanation, after middle-of-the-night notice, with no opportunity to contact or retain

counsel, much less meaningfully prepare, beforehand raises serious due process concerns. Accordingly, Ms. Rodriguez Flores respectfully prays that this Court issue a writ of habeas corpus requiring Respondents to release him under the conditions set forth in his Petition.

Date: March 16, 2026

/s/ María Amelia Calaf
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March 2026, a true and correct copy of this document was served on all counsel of record who have appeared in this case using the Court's CM/ECF system as a Filing User.

/s/ María Amelia Calaf
María Amelia Calaf