UNITED STATES DISTRICT COURT

DISTRICT OF COLORADO

Norge Carralero Silvera
A[redacted]
Petitioner

v.

Field Office Director
U.S. Immigration and Customs Enforcement
Denver Field Office

Warden
Aurora ICE Processing Center,

3130 North Oakland Street
Aurora, Colorado 80010

Respondents

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
MAR -5 2026
JEFFREY P. COLWELL
CLERK

EMERGENCY MOTION FOR STAY OF REMOVAL

Petitioner **Norge Carralero Silvera** respectfully requests an **Emergency Stay of Removal** while his Emergency Petition for Writ of Habeas Corpus is pending before this Court.

I. EMERGENCY NATURE OF THIS REQUEST

This is an emergency request.

On February 25, 2026, an Immigration Judge granted bond to Petitioner.

Petitioner's family attempted to pay the bond immediately.

The Department of Homeland Security refused to release Petitioner and stated that they intend to appeal the Immigration Judge's bond decision.

Petitioner remains detained despite being granted bond.

DHS has applied an automatic stay of the Immigration Judge's bond order pending appeal.

Petitioner fears removal before the Court reviews the habeas petition.

Emergency relief is necessary.

II. PETITIONER BACKGROUND

Petitioner entered the United States on December 29, 2023 and was released under Form I-220A.

Petitioner has no criminal history.

Petitioner has a valid employment authorization document.

Petitioner has strong family ties in the United States.

Petitioner has a United States citizen fiancée who intends to file Form I-130 on his behalf.

Petitioner intends to pursue lawful immigration relief.

III. IRREPARABLE HARM

Removal before this Court reviews the habeas petition would cause irreparable harm.

Petitioner would be separated from his family.

Petitioner would lose the opportunity to pursue lawful immigration relief.

Petitioner would suffer serious hardship if removed.

IV. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. Grant an Emergency Stay of Removal
2. Prevent Petitioner's removal while this habeas petition is pending
3. Grant any other relief the Court considers proper.

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Petitioner:
Norge Carralero Silvera

[redacted]

Filed on behalf of Petitioner by:

Ashley Leyva

818-826-8039

Signature:

Date: March 2, 2026

Docusign Envelope ID: A58F61A8-1660-4E26-8E0D-02BA2B7F2383

I am writing this letter on behalf of someone I know personally and trust,My name is Richard Manuel Silvera Perez, and I am a lawful permanent resident of the United States. I am writing in support of my cousin, Norge Carralero Silvera, and his request for bond.

When Norge arrived in the United States, I received him into my home. From the very beginning, I was able to see his determination and willingness to work. Since day one, he has consistently shown courage, responsibility, and a strong work ethic. He has worked nonstop, always focused on supporting himself and helping his family.

I have personally seen how seriously Norge takes his responsibilities. He has made a clear effort to live responsibly by working steadily, paying his bills, and handling his obligations in an honest and consistent way. He is not someone who avoids responsibility; instead, he looks for ways to move forward through hard work.

Based on my firsthand experience living with him and observing his daily life, I believe Norge is dependable and committed to complying with all legal and court requirements. I am willing to continue supporting him if he is released and to help ensure that he attends all immigration court hearings as required.

For the reasons stated above, and because he has a strong support of his family and friends, I respectfully request that the Court consider granting Norge Carralero Silvera a bond. Thank you for your consideration.

Respectfully,

Firmado por:
A8B1A059DAAA4BD...
Richard Manuel Silvera Perez

Docusign Envelope ID: 24DCAC62-C65C-4DDC-A4B8-D0EC2760A717

I am Norge Carralero Silvera's cousin, I respectfully submit this letter in his support, someone whom I know well. My name is Yamile Carralero Cruz, and I live in Miami, Florida. I want to share my perspective I am proud to support my cousin in this bond request.

I have known Norge for many years and consider him to be a hardworking and responsible person. He has always been committed to working and supporting himself and his family. He is respectful, dependable, and focused on doing the right thing. Since arriving to this country he has worked to support himself and his family, has strong personal values as a person, he feels stable and safe here.

Throughout this process, I have remained in contact with Norge and have continued to support him. I am willing to assist him in any way possible if he is released, including offering guidance and helping ensure that he follows all court requirements and attends his immigration hearings.

He has strong reasons to remain in this country and therefore presents no meaningful risk of flight, I respectfully request that the Court consider granting Norge Carralero Silvera a bond, he has consistently shown responsibility and love for this country, where he feels the most safe, thank you for you time.

Sincerely,



Yamile Carralero Cruz

Docusign Envelope ID: 9A85BED9-9F1B-461A-B324-FE09939916D0

As a member of the community in Colorado, I am writing in support of my cousin Norge Carralero Silvera, My name is Kirenia Carballo Ramirez, and I am a lawful permanent resident of the United States. I am proud to support him in his request for bond.

I have known Norge for many years and consider him to be a very hardworking and responsible person. He has always shown a strong commitment to working and supporting his family. He is dependable, respectful, and someone who takes his responsibilities seriously.

Norge is the kind of person who is willing to put in the effort needed to build a stable life. He is focused on working, supporting his loved ones, and moving forward in a positive and lawful way. I am willing to assist him in any way I can if he is released, including providing support and helping ensure that he complies with all court requirements.

I respectfully request that the Court consider granting Norge Carralero Silvera a bond so he may remain under the close oversight of his family, have the opportunity to work toward building a stable life with his future wife.

Thank you for your time and consideration.

Respectfully,

DocuSigned by:
D4DD5BB0046886488...

Kirenia Carballo Ramirez

Docusign Envelope ID: DA44C1CD-7100-4D36-B7FE-9C692060FA68

My name is Marcos Alberto Perez Vazquez, and I am a lawful permanent resident of the United States. I am writing this letter in support of my lifelong friend, Norge Carralero Silvera, and his request for bond.

I have known Norge since we were born. We grew up together and have shared our lives as close friends and family. Because of this, I know his character deeply and personally. When Norge arrived in the United States, I lived with him and helped him as he began building his life here. From the very beginning, I witnessed his dedication, discipline, and strong work ethic.

Norge has always been a hardworking and responsible person. I have personally seen how seriously he takes doing things the right way. He has consistently worked, followed the rules, and focused on supporting himself and helping his family. He is someone who does not take shortcuts and who values honesty and responsibility.

Through many conversations, I know that Norge values life in the United States and wants to continue his process here in a lawful and respectful manner. He sees this country as a place of stability and opportunity, and he is grateful for the chance to work and live responsibly. I am very proud of the person he is and the effort he has made since arriving.

I am fully committed to ensuring that Norge complies with all immigration court requirements, attends all hearings, and follows any conditions set by the Court.

Based on his strong family ties and stable support system, he does not present a risk of flight. I respectfully request that the Court grant Norge Carralero Silvera a bond. Thank you for your consideration.

Respectfully,



Marcos Alberto Perez Vazquez

Docusign Envelope ID: 75DEF194-530C-48BE-9145-06EECBD36848

I am writing to formally express my support for my nephew, Norge Carralero Silvera, and to confirm my willingness to serve as his bond sponsor. My name is Ricardo Silvera Lopez, and I am a lawful permanent resident of the United States.

When Norge arrived in this country, I received him into my home. During that time, I was able to personally observe his character, work ethic, and daily conduct. Since his arrival, Norge has consistently shown that he is a hardworking, respectful, and responsible individual who takes his obligations seriously. He has always been focused on working, supporting his family, and moving forward in a positive and lawful manner.

Norge is a person with strong values who cares deeply about his family. From my conversations with him, I know that Norge values stability and life in the United States and intends to continue his immigration process responsibly. He has clear plans to remain compliant with all legal requirements and to build his future here in an orderly and respectful way.

As his bond sponsor, I fully understand the responsibility this role carries. I am committed to ensuring that Norge complies with all conditions set by the Court, including attending all scheduled hearings and following any instructions given to him. I am confident in his willingness and ability to do so.

Based on my firsthand knowledge of his daily conduct and responsibility, I respectfully ask the Court to consider allowing Norge Carralero Silvera to remain in the community while his case proceeds with his family. I appreciate the opportunity, thank you

Respectfully,



Ricardo Silvera Lopez

My name is Ashley Leyva, and I am a United States citizen residing in Miami, Florida. I respectfully submit this letter in strong support of the bond request for my fiancé, Norge Carralero Silvera.

I have been in a committed relationship with Norge since January 4, 2018. Over the course of our long-term relationship, I have come to know him as a responsible, hardworking, and selfless individual who consistently places the needs of his family before his own. Since arriving in the United States, Norge has worked diligently to support his family, including providing financial assistance to his mother and his 87-year-old grandmother, who both depend on him for essential support.

Norge is a devoted son and grandson, and his sense of responsibility toward his family reflects his strong moral character. He is a respectful, reliable, and hardworking person who contributes positively to those around him. In our relationship, he has been a supportive and dependable partner who values stability and family unity.

I am fully willing and able to provide housing for Norge upon his release, and I commit to assisting him with transportation and ensuring his appearance at all future immigration court hearings and appointments. I understand the seriousness of these proceedings and take this responsibility very seriously.

We also intend to marry and continue building our life together in the United States. Our plans reflect a long-term commitment and further demonstrate his strong ties to the community and lack of flight risk.

I respectfully request that the Court grant Norge Carralero Silvera a reasonable bond so that he may be released and continue supporting his family while fully complying with all immigration requirements.

Thank you for your time and consideration.

Respectfully,



Ashley Leyva

AFFIDAVIT OF SUPPORT AND RELATIONSHIP

I, Ashley Leyva Pupo, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a citizen of the United States. I was born on August 22, 2002, in Cuba. I currently reside in Miami, Florida, United States.

2. I am the fiancé of Norge Carralero Silvera, [redacted] a native and citizen of Cuba, who is currently detained at the ICE Aurora Detention Center in Aurora, Colorado.

3. I have been in a committed and genuine relationship with Norge Carralero Silvera since January 2018. Our relationship has been continuous and stable for several years. We have supported each other emotionally and financially, and we have maintained consistent communication, including during his detention. We plan to marry as soon as legally possible.

4. During the time I have known Norge Carralero Silvera, he has consistently demonstrated strong moral character. He is honest, hardworking, respectful, and responsible. He has been employed in the United States for approximately two (2) years and has paid taxes during that time.

5. To my knowledge, Norge Carralero Silvera has no criminal record. He has never been arrested or convicted of any crime and has always conducted himself peacefully and lawfully.

6. Norge Carralero Silvera fears returning to Cuba. He has shared with me his fear of persecution due to the political conditions in Cuba and the treatment of individuals who oppose or are perceived to oppose the Cuban government. I genuinely believe that returning him to Cuba would place him in danger.

7. His detention has caused significant emotional hardship to both of us. His continued detention and possible removal would cause severe emotional hardship to me as a U.S. citizen.

8. If released on bond or parole, Norge Carralero Silvera will reside with me in Miami, Florida. I will ensure full compliance with all court and ICE requirements.

9. I am willing and able to provide housing, financial support, transportation, and supervision for Norge Carralero Silvera upon his release.