BABBAR
& ASSOCIATES P.C.
ATTORNEYS AT LAW

Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

March 27, 2026

Re: Garcia v. Shanahan, 26-cv-01508 (EK)

Honorable Judge Komitee,

I respectfully write on behalf of Respondent, Geser Leiva Garcia (A# [redacted]2), to request that the Court schedule a second bond hearing in this matter.

Our office was only recently retained to represent Mr. Leiva Garcia in his immigration proceedings, and due to the timing of our retention, we did not have a meaningful opportunity to gather, prepare, and submit the necessary supporting documentation in advance of the bond hearing held on March 27, 2026. As reflected in the Court's order, no evidence was submitted on Respondent's behalf at that time, which significantly impacted the outcome of the custody redetermination.

Since being retained, we have begun compiling substantial evidence relevant to the bond, including documentation addressing Mr. Leiva Garcia's family ties, community support, lack of flight risk, and other favorable discretionary factors. We respectfully submit that this evidence is material and would assist the Court in making a fully informed custody determination.

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In light of these circumstances, we respectfully request that the Court exercise its discretion to reopen or schedule a subsequent bond redetermination hearing to allow Respondent a fair opportunity to present evidence in support of his release.

We appreciate the Court's consideration of this request.

Respectfully submitted,



Pallvi Babbar, Esq.

Counsel for Petitioner

cc: All counsel of record (via ECF)