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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT

In the Matter of:
KARLA BLASINA JIMENEZ-NAVARRO
A# [REDACTED]

MOTION FOR BOND HEARING

Respondent, through her Next Friend, KARLA DANIELA MARTINEZ JIMENEZ, respectfully requests that this Court schedule an individualized bond hearing.

I. INTRODUCTION

Respondent is currently detained at Stewart Detention Center under the custody of Immigration and Customs Enforcement (ICE). She has a pending application for asylum and seeks protection under United States immigration laws.

Despite her ongoing case, Respondent has not been provided with a meaningful opportunity to request release on bond.

II. FACTUAL BACKGROUND

Respondent has been detained for a prolonged period without a bond hearing. She has no criminal history that would make her a danger to the community, and she has strong family ties in the United States, including her daughter, who resides in Durham, North Carolina.

Respondent is not a flight risk and is willing to comply with all conditions imposed by the Court.

III. LEGAL BASIS

Under immigration law and principles of due process, detention must not be excessive or unreasonable. Prolonged detention without an individualized bond hearing violates fundamental fairness and due process protections under the Fifth Amendment.

Respondent is entitled to a bond hearing where she can demonstrate that she is neither a danger to the community nor a flight risk.

IV. REQUEST FOR RELIEF

WHEREFORE, Respondent respectfully requests that this Court:

1. Schedule a prompt individualized bond hearing;
2. Grant release on bond under reasonable conditions;
3. Grant any other relief deemed appropriate by the Court.

Respectfully submitted,

KARLA DANIELA MARTINEZ JIMENEZ

Next Friend of Respondent

[REDACTED]

Email: [REDACTED]

Date: 04-02-2026

