

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION

BONILLA MARTINEZ, Oscar Arquimides

A [REDACTED]

Petitioner,

v.

NIKITA BAKER, *et. al.*

Respondents.

Case No. 1:25-cv-2027-BAH

**PETITION FOR WRIT OF
HABEAS CORPUS**

JOINT STATUS UPDATE AND REQUEST SET A NEW STATUS UPDATE DEADLINE

Petitioner, by and through his attorney, Raymond O. Griffith and Griffith Immigration Law, jointly with Respondents, through their attorneys of record, Thomas F. Corcoran and Charles R. Gayle, file this Status Update and Request to Set New Status Update Deadline with this Court.

1. On June 24, 2025, Petitioner Oscar Arquimides Bonilla Martinez, filed a Petition for Writ of Habeas Corpus.
2. On June 27, 2025, this Court held a Telephonic Conference with the Parties' attorneys and set a briefing deadline for the Respondents to respond to Petitioner's Petition for Habeas Corpus by July 7, 2025, and a deadline for the Petitioner to respond to the Government's response by July 14, 2025, for a response.
3. On July 7, 2025, the Respondents filed a Response to Petitioner's Petition for Writ of Habeas Corpus and Motion to Dismiss or Stay.

4. On July 10, 2025, counsel for Petitioner filed a Motion to Reopen Removal Proceedings with the Immigration Court based on Respondent's Fear of Persecution or Torture in Mexico. If the removal proceeding with the Immigration Court are reopened, the Petitioner may be eligible to petition for a bond.
5. On July 29, 2025, this Honorable Court ordered a Joint Status update to be filed on August 12, 2025.
6. On August 12, the Petitioner filed a Joint Status Request and Petition to Set a New Status Update, with no opposition from the Respondent, due to the fact that the Motion to Reopen with the Immigration Judge was still pending. The Honorable Judge set a new status report deadline of August 26, 2025.
7. As of today, the Motion to Reopen with the Immigration Court is still pending. Counsel for Petitioner has been in contact with the Immigration Court who has indicated that the Judge has been experiencing a very large number of cases added to his docket but will try to have a ruling as soon as possible.
8. The Respondent does not oppose the setting of a new Status Report date.

WHEREFORE, the Petitioner without opposition from the Respondents respectfully requests that this Honorable Court grant and set a new status report with a deadline of two weeks from today, September 9, 2025.

Respectfully submitted,

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Attorney for Petitioner

Dated: August 26, 2025