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November 5, 2025

The Honorable Katharine S. Hayden  
United States District Judge  
United States District Court of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: Request for Pro Hac Vice of Steven Lyons in  
Vicens-Marquez, Ruperto v. Soto et al  
(Habeas Case Delaney Hall Detention Facility)  
Case No. 2:25-cv-16906-KSH**

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Dear Judge Hayden:

I am local counsel for Petitioner, Ruperto Vicens-Marquez, in the above-captioned matter scheduled for hearing today at 3:00 p.m. I respectfully request the Court's permission to allow Steven Lyons, Esq., an attorney and a member in good standing of the bar of the State of New York (NY Bar No. 1832013) to appear pro hac vice for this urgent conference.

All required pro hac vice application paperwork, including certifications and a proposed order, will be promptly filed in accordance with Local Civil Rule 101.1(c). Local counsel will remain responsible for compliance with local procedures.

Due to the emergency nature of today's hearing and considering counsel's longstanding representation of the client—who has resided in the U.S. since 2007, owns local businesses, and is the parent of three U.S. citizen minor children—granting this request would serve the interests of justice and judicial efficiency.

I respectfully request that the pro hac vice application be considered on an expedited basis.

Thank you for Your Honor's consideration and attention to this urgent matter.

Respectfully submitted,

/s/ Martin W. Chow, Esq.

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