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December 29, 2025

BY CM-ECF

The Honorable Claire C. Cecchi
United States District Judge
District of New Jersey
50 Walnut Street, 4015
Newark, NJ 07104

Re: Deyvis Gamaliel Vasquez-Salazar v. Bondi, et al,
Case No.: 25-cv-17195
Matter: Status Update – Bond Hearing Did Not Proceed as Ordered

Your Honor:

This Office represents the Petitioner in the above-references habeas corpus petition. I am writing to report Respondents' noncompliance with this Court's December 23, 2025, Order (ECF No. 7) requiring an individualized bond hearing within seven days.

Petitioner's hearing was scheduled for today at 9:00 A.M. before Immigration Judge Nicole Lane. Counsel filed a comprehensive evidence packet on December 26, 2025, through ECAS, including this Court's Order, bond sponsor affidavit, SIJS approval, and supporting documentation.

When the matter was called at 10:15 A.M., DHS counsel stated they had not reviewed the evidence packet due to its "pending" status on ECAS, despite having three business days to access it. Counsel requested the hearing be rescheduled for that afternoon to allow DHS time to review. Both DHS and Judge Lane opposed and refused. Judge Lane terminated the hearing without any individualized assessment, making no findings on flight risk or danger as this Court ordered. Counsel was required to withdraw the bond application without prejudice.

Counsel observed multiple other cases with federal court orders requiring bond hearings similarly dismissed that morning, suggesting systematic noncompliance.



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The evidence demonstrates overwhelming grounds for release. Petitioner was granted Special Immigrant Juvenile Status by the Superior Court of New Jersey based on findings of abuse and neglect. He has filed his I-360 petition with USCIS. His uncle, Daniel Asmen Vasquez, is a qualified sponsor previously vetted and approved by ORR in April 2023. Petitioner has resided continuously at the same address in Keansburg, New Jersey for over two years, maintained steady employment, has no criminal history, and poses no flight risk or danger.

Petitioner came to this country as an unaccompanied minor fleeing abuse. He has complied with every requirement for over two years. He is detained not because he poses risk, but because Respondents refuse to conduct the hearing this Court ordered.

For these reasons, undersigned counsel respectfully requests that this Court order Petitioner's immediate release on his own recognizance or on reasonable bond conditions.

Thank you for your consideration of this request.

Respectfully submitted,



Franklin S. Montero, Esq.
Counsel for Petitioner

Cc: *Counsels for Respondents* (by CM-ECF)