

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SARA VALERIA VELASQUEZ-GOMEZ,
Petitioner,

- against -

LUIS SOTO, in his official capacity as Facility
Director, Delaney Hall Detention Center;
ALEXANDER CABEZAS, in his official capacity
as Director for the Newark Field Office for
Immigration and Customs Enforcement; KRISTI
NOEM, in her official capacity as Secretary of
Homeland Security; PAMELA JO BONDI, in her
official capacity as Attorney General of the United
States of America,

Respondents.

No. 2:25-cv-17327

NOTICE OF MOTION TO ENFORCE

PLEASE TAKE NOTICE that as soon as counsel may be heard, I, Anwen Hughes, hereby move this Court pursuant to Local Rule 7.1 for an Order to Enforce on behalf of Petitioner, Ms. Sara Valeria Velasquez-Gomez, to ensure compliance with this Court's Order of November 21, 2025 requiring that Petitioner receive "an individualized bond hearing in accordance with 8 U.S.C. § 1226(a) before an immigration judge who shall assess whether she presents a flight risk or a danger to the community." Petitioner received a bond hearing on December 1,

2025 and was ordered released on bond of \$3,000 with no additional conditions. That bond was posted on December 2, 2025. Thereafter, however, instead of releasing Petitioner in accordance with the Immigration Judge's bond decision, ICE purported to retain the authority to unilaterally impose a GPS ankle monitor on Petitioner. Respondents have as yet taken no position on this motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Petitioner shall rely upon the annexed (i) Immigration Judge Bond Order; (ii) Declaration of Sara Velasquez-Gomez; and (iii) Helland Memorandum.

It is respectfully requested that the Court rule upon this Motion, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: December 18, 2025

/s/ Anwen Hughes
Anwen Hughes
HUMAN RIGHTS FIRST
121 W 36th St., PMB 520
New York, NY 10018
Tel: (212) 845-5244
HughesA@humanrightsfirst.org

Nathan Yaffe* (*pro hac vice*)
LAW OFFICE OF MATTHEW BRAY
119 West 23rd Street, Suite 900
New York, NY 10011
Tel: (646) 253-0580
nathan.yaffe@protonmail.ch

* NOT ADMITTED IN THE
DISTRICT OF NEW JERSEY –

Attorneys for Petitioner
SARA VALERIA VELASQUEZ-GOMEZ