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Hon. Michael E. Farbiarz, U.S.D.J.
By ECF

Jan. 20, 2026

Re: Pablo Martinez Ron v. Todd Lyons, Et. Al.
Docket No. 25-17359


Dear Judge Farbiarz,

In response to the Court's Order for submissions relating to the lack of Due Process in the Petitioner's bond hearing before the immigration court, I write to include a transcript of the hearing and brief comments. The Court is already in possession of the evidentiary submission to the immigration court. The transcript demonstrates that the immigration judge employed an impossible standard contrary to law that denied Due Process. Placing the burden of proof on the immigrant to prove the negative that he is not a flight risk or danger to the community rather than requiring the government to prove that he is a flight risk or a danger to the community is already constitutionally infirm, but imposing a standard that is impossible to meet throws dirt on the grave of Due Process.

The immigration judge concluded that having prior addresses, despite updating the court of his address and clearly having a stable address at his fiancée's home that she owns, constituted a risk of flight. This would bar literally every immigrant from establishing the lack of flight risk as no immigrant comes to the U.S. and remains at one address indefinitely.

The immigration judge concluded that a fiancé with whom the petitioner lived and was undergoing IVF treatments did not constitute a meaningful tie to the community; the immigration judge went so far as to say that even if this clearly legitimate couple got married, it still may not constitute a meaningful tie to the community. This demonstrates that the facts of the case were irrelevant; whatever

the facts were, the judge would find a way to discard them to conclude Petitioner had not met his burden.

The immigration judge blatantly stated that “the Court is not concerned about the bond sponsor,” citing Matter of Dobrotvorskii, 29 I&N Dec. 211 (BIA 2025), because considering this case would have had to result in finding that petitioner had a viable and unquestionable bond sponsor in his fiancé who owns her house and makes  annually. Unlike the court’s misapplication of Matter of Akhmedov, 29 I&N Dec. 166 (BIA 2025), which would be an appellate issue, the immigration judge’s outright refusal to consider caselaw that was favorable to the Petitioner is a Due Process violation.

Further, the immigration judge appears to find that Petitioner making \$500 to \$700 per week is somehow an indicator of flight risk without even mentioning the demonstrated stability of his employment. Again, the court’s outright refusal to consider positive factors and only to fabricate negative ones is a violation of Due Process.

Lastly, the immigration judge failed to even attempt to explain how no bond amount could secure petitioner’s appearance. He discarded the possibility from the outset without explanation. The refusal to even provide an explanation is a violation of Due Process.

District Courts considering these issues consistently find these facts demonstrate the lack of flight risk. See U.S. v. Avila-Murillo, 2025 U.S. Dist. LEXIS 58689 (W.D. Kentucky 2025); Jordan v. United States, 2025 U.S. Dist. LEXIS 127222 (W.D. Wash 2025); U.S. v. Hernandez, 2024 U.S. Dist. LEXIS 110419 (N.D. Okla 2025); U.S. v. Schaeffer, 2024 U.S. Dist. LEXIS dsds50330 (C.D. Illinois 2024). A bond hearing that failed to consider positive facts and positive caselaw while applying an impossible-to-satisfy burden of proof is not compliant with Due Process.

Respectfully submitted,
/s/ Eric M. Mark
Eric M. Mark, Esq.



Certificate of Accuracy

**Transcription of CUsersmarisDropboxClient FilesMMartinez Ron,
PabloHabeasBond Audio [REDACTED] DAR request 11-21-
25245-600-610 2025-11-2100020002.wav in English**

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Signed on **16 January 2026**

A handwritten signature in black ink, appearing to be 'Ernestas Duzinas', written in a cursive style.

Ernestas Duzinas, CEO of GoTranscript LTD

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[00:00:04] Immigration Judge Counihan: This is Immigration Judge Brian J. Counihan of the Batavia Immigration Court in bond proceedings on November 21st, 2025, in the matter of Martinez Ron, A-number [REDACTED]. The respondent is detained in the custody of the Department of Homeland Security and is appearing in person from the Buffalo Federal Detention Facility in Batavia, New York. I have familiarized myself with the bond record of proceedings.

The Department of Homeland Security is represented by Assistant Chief Counsel Gregory Mayer, appearing via Webex, and the respondent is represented by Counsel Eric Mark, also appearing via Webex. Also joining us on Webex are ACC Andrew Creado for cases later today, as well as somebody under a 201 area code. Through the Spanish interpreter., who's here under a 201 area code?

[crosstalk]

[00:00:59] Interpreter: [Spanish language] Interpreter needs a repetition.

[00:01:05] Immigration Judge Counihan: Madam Interpreter, stand by. Who's under the 201 area code, and are you an English speaker?

[00:01:12] Trisha Simone: Yes, I speak English. My name is Trisha Simone. I'm the fiancée of Pablo.

[00:01:19] Immigration Judge Counihan: Thank you. Who is Nadia? I have somebody logged in named Nadia without a last name, a case, or an organization. Who are you, Nadia?

[00:01:29] Nadia: I am here for Rohan with Shona McLean.

[00:01:33] Immigration Judge Counihan: You're here for-- okay. I'm going to put you into the Webex lobby. His case is going to be next when Ms. Shona McLean gets here. Be patient. I'll be with you in a few moments.

[00:01:46] Nadia: Okay. Thank you.

[00:01:49] Immigration Judge Counihan: All right. Everyone on Webex is notified that it's prohibited to record any part of the proceeding. Unauthorized recording may result in criminal, civil, or administrative penalties. You should consult the immigration court practice manual if you want a record of proceedings. Mr. Mark, do you acknowledge having heard that advisal?

[00:02:04] Mr. Mark: Yes.

[00:02:07] Immigration Judge Counihan: One moment.

[pause 00:02:13] Ms. Sinan, do you acknowledge having heard that advisal?

[00:02:42] Ms. Sinan: Yes.

[00:02:44] Immigration Judge Counihan: All right. This is a continuation of a bond hearing that started on November 13th of 2025. The court gave the respondent his

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right to counsel advisals, the nature and purpose of the hearing, evidentiary rights, as well as his appeal rights. One moment. [silence] He was pro se last time, Mr. Mark. You were not here last time after the rights explanation and marshaling of the evidence and going over the procedural history of the removal case.

The I-830 showing that the respondent is here in Batavia. The respondent had asked for an adjournment to get an attorney and evidence. The court determined to give your client that continuance based on due process concerns. I imagine the habeas was granted in keeping the respondent's due process in mind and the respondent wasn't prepared to go at the quickly scheduled bond hearing. He was given an opportunity to present his evidence today. We have a previously sworn Spanish interpreter on the line. Through the interpreter to the respondent. Good morning, sir. How are you today?

[00:04:15] **Interpreter:** [Spanish language]

[00:04:18] **Pablo Eduardo Martinez Ron:** [Spanish language]

[00:04:22] **Interpreter:** Very good. Thank you. Good morning.

[00:04:24] **Immigration Judge Counihan:** Sir, what's your full name?

[00:04:27] **Interpreter:** [Spanish language]

[00:04:29] **Mr. Martinez:** Pablo Eduardo Martinez Ron.

[00:04:36] **Immigration Judge Counihan:** I remind you that you're still under oath to tell me the truth. Do you understand?

[00:04:41] **Interpreter:** [Spanish language]

[00:04:43] **Mr. Martinez:** [Spanish language]

[00:04:49] **Interpreter:** Yes.

[00:04:50] **Immigration Judge Counihan:** Sir, a moment ago, I introduced the case in the English language and on the screen to your right is the government's lawyer.

[00:05:00] **Interpreter:** [Spanish language]

[00:05:13] **Immigration Judge Counihan:** Also on there is Ms. Trisha Sinan.

[00:05:18] **Interpreter:** [Spanish language].

[00:05:23] **Immigration Judge Counihan:** On there is also Attorney Eric Mark.

[00:05:26] **Interpreter:** [Spanish language].

[00:05:31] **Immigration Judge Counihan:** Is Mr. Mark your lawyer?

[00:05:35] **Interpreter:** [Spanish language]

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[00:05:37] **Mr. Martinez:** [Spanish language]

[00:05:40] **Interpreter:** Yes, sir.

[00:05:40] **Immigration Judge Counihan:** Do you authorize him to speak on your behalf today?

[00:05:44] **Interpreter:** [Spanish language]

[00:05:47] **Mr. Martinez:** [Spanish language]

[00:05:50] **Interpreter:** Yes, sir.

[00:05:51] **Immigration Judge Counihan:** All right, Madam Interpreter, please stand by. Mr. Mark, do you want full and complete interpretation?

[00:05:58] **Mr. Mark:** Yes, Judge.

[00:05:59] **Immigration Judge Counihan:** All right, through the interpreter, sir, I am going to speak to the lawyers for a moment in the English language, and I'll speak to you afterwards through the interpreter.


[00:06:07] **Interpreter:** [Spanish language]

[00:06:19] **Mr. Martinez:** [Spanish language]

[00:06:21] **Interpreter:** Yes, sir.

[00:06:22] **Immigration Judge Counihan:** All right, Madam Interpreter, please stand by. Mr. Mark, Mr. Mayer, this case, again, as I said, let's reset. Mr. Mark, the Exhibit number 1 is the district court's order setting this bond hearing. Exhibit 2 is DHS's 21 pages of evidence. It includes the I-213 and the respondent's I-589. Now I have what would be proposed Exhibit number 3, and that is your filing. Is that right, Mr. Mark?

[00:06:56] **Mr. Mark:** Yes, Judge.

[00:06:57] **Immigration Judge Counihan:** All right, that contains 66 pages, a lot of which is the in vitro fertilization documents, but it has a letter from Trisha Sinan, those IVF records. The respondent's pay stubs, which look like they're about \$237, \$790. Page 37 is \$450, and another one for \$558. That looks like they are weekly paychecks. Then there's employment verification from the respondent's fiancée. It looks like she nets or grosses  a year. There's a house deed for the respondent's long-term partner or fiancée's mother, where the respondent's long-term fiancée lives, and there are support letters and photos. Any objection, Mr. Mayer, if those come in as exhibit number three?

[00:08:02] **Mr. Mayer:** No notice to inadmissibility. Although I will say when I was reviewing these documents earlier, there were some documents that were indiscernible. To the extent that any documents are indiscernible, they should not be admitted.

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[00:08:14] Immigration Judge Counihan: Mr. Mayer, I think what you're talking about is those pay stubs. They look like they're photographs, and they're not good photographs that are uploaded, but I was able to zoom in and at least see that they were, it looks like, weekly pay stubs in the amounts that I noted. Is there anything else under exhibit number three that's illegible? That was what jumped out at me.

[00:08:34] Mr. Mayer: Yes, I think that would be about it, but when I was reviewing it earlier today, there was a letter that was somewhat indiscernible. Now, as I review it appears it is discernible, so perhaps it was a function of the computer, which can happen.

[00:08:52] Immigration Judge Counihan: All right, I'll receive exhibit number three into evidence and give it the weight that it deserves. Mr. Mark, pursuant to Immigration Court Practice Manual 9.36, I am going to limit this hearing to argument instead of witness testimony. At the immigration judge's discretion, witnesses may be placed under oath and testimony taken. However, parties should be mindful that bond hearings are generally briefer and less formal than hearings and removal proceedings.

This is my second habeas order bond hearing today. I have a regular bond hearing afterwards and three individual hearings today, so I am going to limit it to just argument and offers of proof in lieu of testimony. It's my understanding that the government is holding your client no bond per the district court warrant 236A. I imagine there's no agreement on bond. Is that right, Mr. Mayer?

[00:09:47] Mr. Mayer: That's right. There's no agreement.

[00:09:51] Immigration Judge Counihan: Hold on. [silence] Mr. Mayer, I know it's Mr. Mark's burden of proof. Do you anticipate arguing danger?

[00:10:02] Mr. Mayer: I'm not going to argue danger here. I'll be arguing flight risk.

[00:10:08] Immigration Judge Counihan: All right, Mr. Mark, I'll give you an opportunity to argue first, and then we'll hear from Mr. Mayer, and then you'll have, since you have the burden of proof, I'll have you argue last. Go ahead, counsel.

[00:10:20] Mr. Mark: Thank you, Judge. I don't have much to say besides the documentation we submitted as to he's clearly anchored. He has a fiancée. They have begun the IVF process, invested a lot of money, time, and love into that. Clearly has motivation to be where he is. His housing is stable as he lives with his fiancée in a house that is owned by his fiancée's mother. They all live there together, so he has strong ties to the community. Both are employed.

He's employed by a temp agency pursuant to his work authorization document. When he's released, he would be able to maintain employment and stability. Even if he weren't, his fiancée has a good job for the working for the New York MTA. That job is secure and pays well. There is really no risk of flight in this situation as he has every ability to remain where he is, every motivation to stay where he is, and every indication that he has the support he needs to stay where he is.

[00:11:31] Immigration Judge Counihan: All right. Mr. Mayer.

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[00:11:35] Mr. Mayer: The burden is on the respondent to establish risk of flight or no risk of flight. Here, the respondent has failed to meet that burden. The respondent is an Ecuadorian citizen national. He entered without inspection on or about December 13th, 2023. He's only been in the United States for less than two years. He's placed in removal proceedings on December 15th within two days of his arrival via notice to appear charting under 212(a)(6)(A)(i). He's only appeared once in court on June 14th, 2024.

He has changed addresses between various states no less than five times within the last minimum two years. He has no meaningful employment or community ties or any probable path to obtain lawful status to assure his release on bond. The reason for this is that he has at best a 589, which is barred by the circumvention of lawful pathways. Also, separate apart from that, even if it weren't, if you look at the merits of the underlying 589 which we have submitted, it's essentially a refusal to join or a refusal to pay extortion fee claim, which historically has not had a high likelihood of success.

Respondent would bear the burden of showing that his path to relief has a high likelihood of success, which it does not. This case is almost indistinguishable for Matter of R-A-V-P-, 27 I&N DEC 803 805 (BIA 2020). Then also, we submitted as well that because the respondent's changed his address so many times, he's only notified the court of a change of address once. The one time he did, the notice of hearing went out and was returned, showing that it was marked as undeliverable, which is in evidence.

Under Matter of AKHMEDOV, 29 I&N Dec. 166 (BIA 2025), significant discrepancies regarding whether the respondent lives in New York or Michigan and his past failure to file timely change of addresses with the court when considering the totality of circumstances demonstrate that respondent can be a flight risk and does not warrant release on bond for any amount. I would point out as well, if you look at the IVF documentation, it has a different date of birth for the respondent than what he's listed in all of his other prior documentation.

If you go to it, if you look at the signature page, page 24 of the respondent's own evidence, it has listed a date of birth of July 10th, 1989. His 589 and 213, **[unintelligible 00:14:04]** he filled out himself and filed, says June 10th, 1988. To the extent that he's either presenting false IDs to this IVF facility or other places, or is using alternate date of births at minimum, there's certainly an identity issue, perhaps even a fraud issue that would warrant a flight of determination.

Certainly, it's the respondent's burdened to rebut that, and he hasn't done that. In fact, his own evidence causes the problem. Then finally, I would also note that he has no meaningful family ties in the United States. I'd also point out to the court, actually, on the same employment documentation we were talking about earlier with the pay stubs, he doesn't list-- that address is October 2025 for the pay stubs- he doesn't list the fiancée's address. He lists a completely different address, in 51 Hamilton Place, Erdington, New Jersey.

He's not even showing on his own pay stubs right now that he actually lives with the spouse he purportedly plans on living with, and will plan on living with. When you

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look at those discrepancies in the evidence, this case is much closer to Matter of R-A-V-P and Matter of AKHMEDOV than any case of warranting release on bond. Thank you, Your Honor.

[00:15:19] Immigration Judge Counihan: All right. Mr. Mark, any response?


[00:15:23] Mr. Mark: Judge, briefly. The points counsel's made as far as changing his address, he has notified the court. He hasn't missed any court dates, which would be the significant factor. He has now had a permanent address, living with his fiancée in a house that is owned by his fiancée. That he had employment prior to moving there and didn't update his address with his employer is irrelevant, as very few people actually do that when they have a job. Things take time to get done like that, and it doesn't affect everyday life.

Counsel argues he has no meaningful ties to the United States. This can't be accurate. He has a fiancée, he has letters from the fiancée's family, and they are going through an IVF process. Can't really imagine something more meaningful than a partner who you're trying to have children with. Regarding circumvention of lawful pathways, I addressed that in my statement, that is an issue to be litigated. It does not bar his application. It is an issue to be litigated throughout the process of the court. It does not affect flight risk at all.

The statement that he has a burden to show a high likelihood of success on his application is not accurate. That is not a burden that anybody holds in bond proceedings. The burden is to show he's not a flight risk by preponderance of the evidence, not a high likelihood. It's not an accurate statement. It's also not accurate. There are certainly issues to be addressed in his application. That would be addressed. That is for litigation, and he has motivation to pursue that.

He also, as we said, he has a fiancée, and potentially will be pursuing other avenues of relief. As for the date of birth on the IVF document, we are aware that is a typographic error on paperwork. His fiancée is here present. She has informed me that they're in the process of correcting that, but was unable to get the document in time to correct it as those things take time. Certainly, if the court is interested, can speak with Ms. Sinon to confirm that information, but a typographical error on the date of birth on medical records for in vitro fertilization is certainly not an indication of flight risk or fraudulent intent.

It has no relevance on anything to eligibility or anything like that. It's the date of birth on a medical record that is slightly incorrect. I have nothing further to say beyond that.

[00:17:52] Immigration Judge Counihan: All right. I'm going to issue an oral decision at this time. This is the oral decision of the immigration court. Name, Pablo Eduardo Martinez Ron. A-number  Respondent was brought into custody and not given a bond. The matter came to be heard on a district court order. Finding that the respondent is eligible for bond under INA Section 236A. The court entered three bond exhibits into evidence, and the court took testimony from zero witnesses.

The court did preclude witness testimony under Immigration Court Practice Manual,

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Chapter 9.36 where at the discretion of the immigration judge. Witnesses may be placed under oath and testimony taken. However, parties should be mindful that bond hearings are generally briefer and less formal than hearings and removal proceedings. The court heard argument and any offers of proof, and offered to hear any offers of proof in lieu of testimony. The court heard argument from counsel on flight risk, as the government is not arguing danger, so flight risk is the only issue. The respondent has not met his burden to demonstrate that his release would not pose a danger to property or person that he is likely to appear for any future proceedings. See 8 CFR Section 1236.1C8. The court finds that the respondent is a flight risk, and ordinarily, the court would look to an amount of bond that would mitigate that flight, and finds in this case that mitigation is not possible by an amount of bond, so the court will deny the respondent's request to redetermine bond from no bond, and the court leaves the bond at no bond.

In general, when evaluating a respondent's petition for custody redetermination, an immigration judge must consider whether an alien is in danger to the community, a risk to national security or flight risk. See, Matter of GUERRA, 24 I&N Decision 37, 40. The immigration judge may base a custody redetermination on any information that is available to the IJ or that is presented to him or her by the alien or the service. 8 CFR section 1003.19D. The respondent bears the burden of demonstrating to the satisfaction of the court that his release would not pose a danger to property or persons or that he is likely to appear for future proceedings. 8 CFR section 1236.1C3; Matter of URENA, 25 I&N Decision 140, 141 - 42 (BIA 2009) and matter of Matter of Adeniji, 22 I&N Decision 1102, 1113 (BIA 1999). The court does look to the common bond factors pursuant to matter of GUERRA and the court first looks to the fixed address in the United States. The respondent does have a bond sponsor who is his long-term partner, as she describes herself in her letter under Exhibit number 3, and she's been referred to as fiancée, she is gainfully employed to the tune of [REDACTED] a year. A house deed was provided where the respondent's fiancée or long-time partner lives with her mother and the respondent is purportedly to live at that location or has lived at that location. However, the government does point out that the respondent has a number of different addresses over the short length of time that he has been in the United States. The government points out that there's a different address on the most recent pay stub, that the respondent does not live with the long-time partner or has not lived with her for very long, does not own that property, is not on a deed or on a lease for that property. It does appear that the respondent and his sponsor, fiancée, long-time partner, were engaged in trying to have children together through in vitro fertilization. There's a number of records in that regard. That shows to this court that the respondent appears to have a relationship with this individual and is looking to start a family. However, the government does point out that the respondent's date of birth is different on the IVF documents. That is only of some concern to the court as respondent's counsel argues that that was a mistake that the fiancée is going to fix. The fact that the respondent has had so many multiple addresses, he does have, it looks like, a record of appearances in court. However, the government also provided under Exhibit number 2 that a hearing notice was returned and that the respondent had not kept his address up to date. The court looks to local family ties enabling the respondent to reside in the United States. There may be some if he marries this fiancée and that fiancée sponsors him and that marriage would be in proceeding, so

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it would be presumptively fraudulent. It could be overcome, but then it's a long way away from any possible adjustment of status with somebody who is not even married yet to that individual. There doesn't appear at this point to be any immediate ability for the respondent to reside in the United States permanently based on any family ties. The respondent doesn't appear to own any property in the United States. The court already addressed the record of appearances in court. The court looks to viable immigration relief. Government argued that the respondent is limited in his relief and respondents counsel argued that that should be litigated later, but the court does, under 1003.19D, look to the I-589 and it is a gang fear claim. The court does look at Matter of H-A-A-V-, 29 I&N Decision 233 (BIA 2025), where even in looking at that just briefly through 8 CFR 1003.19D, it may be subject to pretermission based on even looking at all the facts in the light most favorable to the respondent. The court does look at Matter of AKHMEDOV, 29 I&N Decision 166 (BIA 2025) given the number of addresses over the short amount of time. The court is not concerned about the bond sponsor under Matter of DOBROTVORSKII, 29 I&N Decision 211 (BIA 2025). The court has some pay stubs from the respondent with a different address. Again, he's making less than \$500 a week or around \$500 to \$700 a week. It does not appear that the respondent has a criminal record or any pending criminal charges. The history of immigration violations is the overstay. There is the entry without inspection. The attempts to flee prosecution or escape authorities don't appear on this record, and the manner of entry again was unlawful. The court is not going to consider alternatives to detention. It is not permitted under the immigration law. As such, and based on all the above reasons, the court declines to grant or declines and denies respondent's request to redetermine his bond and leaves the bond at no bond. Transcriber, please add a signature line. Brian J. Counihan, Immigration Judge, dated November 21st, 2025. Mr. Mark, do you anticipate working with your client on the appeal, or do you want me to give him the pro se appeal advisals?

[00:25:52] Mr. Mark: We can give him the pro se appeal advisals. I'm not sure.

[00:25:55] Immigration Judge Counihan: Okay. Is it your intention to reserve appeal, counsel?

[00:26:01] Mr. Mark: Yes, Judge.

[00:26:01] Immigration Judge Counihan: Mr. Mayer.

[00:26:03] Mr. Mayer: Final from the department.

[00:26:05] Immigration Judge Counihan: All right. Through the interpreter, sir, I've heard the argument and made my decision in your case.

[00:26:10] Interpreter: [Spanish language]

[00:26:16] Immigration Judge Counihan: I found that you have not met your burden as to flight, and I've left bond at no bond.

[00:26:22] Interpreter: [Spanish language]

[00:26:46] Immigration Judge Counihan: Your attorney has reserved your right to

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appeal.

[00:26:51] **Interpreter:** [Spanish language].

[00:26:56] **Immigration Judge Counihan:** To appeal, you must file a notice of appeal from EOIR-26 by December 22nd, 2025.

[00:27:04] **Interpreter:** [Spanish language]

[00:27:50] **Immigration Judge Counihan:** Sir, I have provided you with a document or a packet of information that includes that document and tells you about the process of appeal.

[00:27:59] **Interpreter:** [Spanish language]

[00:28:14] **Immigration Judge Counihan:** Please note that that EOIR-26 must be received by the Board of Immigration Appeals by December 22nd, not just mailed by that date.

[00:28:23] **Interpreter:** [Spanish language]

[00:28:46] **Immigration Judge Counihan:** Sir, if you don't appeal within that timeframe, my decision, it will be final.

[00:28:53] **Interpreter:** [Spanish language].

[00:29:02] **Immigration Judge Counihan:** Sir, I appreciate your attorney and your fiancée's efforts on your behalf.

[00:29:08] **Interpreter:** [Spanish language].

[00:29:17] **Immigration Judge Counihan:** I just happen to disagree with your lawyer as to how the facts apply to the immigration law as I see it.

[00:29:23] **Interpreter:** [Spanish language].

[00:29:30] **Immigration Judge Counihan:** All right, Madam Interpreter, please stand by. Anything further, Mr. Mark?

[00:29:35] **Mr. Mark:** No, Judge.

[00:29:35] **Immigration Judge Counihan:** All right, Mr. Mayer?

[00:29:37] **Mr. Mayer:** Nothing further, Your Honor.

[00:29:39] **Immigration Judge Counihan:** All right, sir, there's nothing more from the lawyers. We are adjourned and off the record.

[00:29:52] **[END OF AUDIO]**