

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

ISABELLA MARYANOVSKY,

Petitioner,

v.

Case No. 3:25-cv-1599

Garrett RIPA, Field Office Director of Enforcement and Removal Operations, Miami, Field Office, Immigration and Customs Enforcement; Kristi NOEM, Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, U.S. Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; Scotty RHODEN, Sheriff Of Baker County Detention Center,

Respondents.

_____ /

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioner, ISABELLA MARYANOVSKY, by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 65(a) and (b), M.D. Fla. L.R. 6.01, and M.D. Fla. L.R. 6.02(b), respectfully files this motion for expedited relief seeking entry of a temporary restraining order (“TRO”) by January 5, 2025, during the

pendency of this action seeking habeas relief to ensure Petitioner is released as removal is not reasonably foreseeable, as required under the Fifth Amendment of the United States Constitution.

INTRODUCTION

1. Petitioner ISABELLA MARYANOVSKY is in the physical custody of Respondents at the Baker County Detention Center. She now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

2. Petitioner ISABELLA MARYANOVSKY is a former citizen of the USSR, and now stateless after its dissolution, who has been in immigration detention since December 15, 2025. Petitioner is a noncitizen previously released from immigration custody under an Order of Supervision (“OSUP”) pursuant to 8 C.F.R. § 241.4.


3. Detention authority following a final order of removal is governed by 8 U.S.C. § 1231 and implementing regulations at 8 C.F.R. §§ 241.4 and 241.13.

4. When removal is not reasonably foreseeable, continued detention is constitutionally limited. *Zadvydas v. Davis*, 533 U.S. 678 (2001).

5. DHS regulations impose mandatory procedural safeguards before revoking an Order of Supervision, including notice, opportunity to respond, and review by authorized officials.

6. Government agencies are constitutionally required to follow their own regulations. *Morton v. Ruiz*, 415 U.S. 199 (1974). 26. ICE, like any agency, “has the duty to follow its own federal regulations.” *Haoud v. Ashcroft*, 350 F.3d 201, 205 (1st Cir. 2003) (quoting *Nelson v. I.N.S.*, 232 F.3d 258, 262 (1st Cir. 2000)). To be sure, not every procedural misstep raises a constitutional issue. See *Matias v. Sessions*, 871 F.3d 65, 72 (1st Cir. 2017) (involving an inaccurate translation). However, where an immigration “regulation is promulgated to protect a fundamental right derived from the Constitution or a federal statute,” like the opportunity to be heard, “and [ICE] fails to adhere to it, the challenged [action] is invalid” *Waldron v. I.N.S.*, 17 F.3d 511, 518 (2d Cir. 1993); see also *Ying Fong v. Ashcroft*, 317 F.Supp.2d 398, 403–04 (S.D.N.Y. 2004) (granting alien's habeas petition where she was deported fewer than 72 hours after her arrest and regulation mandated 72-hour rule).

FACTS

7. Petitioner was born on  in Odessa, former Soviet Union (modern day Ukraine). She is a native of the former Ukrainian Soviet Socialist Republic and a citizen of the former Soviet Union.

8. On or about July 9, 1977, Petitioner lawfully entered the United States at New York, New York as a refugee, and she subsequently adjusted status to a lawful permanent resident.

9. On November 14, 1989, Petitioner was convicted by jury of aggravated arson in violation of Section 2909.02 of the Ohio Revised Code. She was ordered to serve a term of five (5) to twenty-five (25) years imprisonment.

10. On November 17, 1989, Petitioner began serving her criminal sentence. However, less than five years later, on September 19, 1994, Petitioner was released on regular parole.

11. On August 17, 2006, removal proceedings were initiated against Petitioner, where it was alleged that she was removable pursuant to Section 237(a)(2)(A)(iii) of the Immigration and Nationality Act (the "INA") in that, after she was admitted, Petitioner

was convicted of an aggravated felony for which the term of imprisonment ordered was at least one (1) year.

12. Petitioner was then taken into Immigration and Customs Enforcement custody; an Immigration Judge later ordered Petitioner released from custody on a bond of \$5,000. In removal proceedings, Petitioner sought relief from removal under former INA Section 212(c), withholding of removal, and the Convention Against Torture.

13. However, the U.S. Department of Homeland Security ("DHS") moved to pretermitt former Section 212(c) relief for Petitioner and argued that Petitioner was ineligible to seek former Section 212(c) relief because she was convicted of an aggravated felony by a jury and not by a plea agreement.

14. On June 13, 2007, the Miami Immigration Court granted DHS's motion to pretermitt.

15. On January 2, 2008, Petitioner, with her counsel, appeared for her individual hearing before the Miami Immigration Court. Through counsel, Petitioner indicated that the conditions in Ukraine had improved, and it was therefore inappropriate to continue seeking relief in the forms of withholding of removal and the Convention Against Torture, and she subsequently withdrew these

two applications for relief. Consequently, the Immigration Judge ordered Petitioner removed.

16. On January 25, 2008, Petitioner appealed the Immigration Judge's decision preterminating her application for a waiver under former INA section 212(c). Petitioner argued (1) that the DHS should be precluded from pursuing removal proceedings against her because it was aware of her arson conviction since the early 1990s, yet it waited until 2006 to initiate proceedings; and (2) the Immigration Judge incorrectly concluded that she was ineligible for former Section 212(c) relief simply because she was convicted pursuant to a jury.

17. On September 29, 2009, the BIA dismissed Petitioner's appeal and affirmed the Immigration Judge's decision.

18. Soon thereafter, on October 28, 2009, Petitioner moved to reopen these proceedings. Ultimately, the BIA denied Petitioner's motion to reopen. To proceed with Petitioner's removal, the DHS formally requested a travel document from the Embassy of Ukraine. However, the Embassy of Ukraine has repeatedly denied that Petitioner is a citizen of Ukraine, and it subsequently refused to issue her a travel document.

19. Notably, the Embassy of Ukraine noted that, “if a person was born in Ukraine[,] he/she would not acquire Ukrainian citizenship automatically nor be considered admissible to Ukraine by birth.”

20. As a result, Petitioner is stateless and has been unable to depart the United States.

21. On June 20, 2023, Petitioner, through undersigned counsel, filed a second motion to reopen with BIA. While a party may generally only file one motion to reopen, per Title 8 of the Code of Federal Regulations, Section 1003.23(b)(1), this numerical restriction does not apply when the new motion to reopen is based on a material change of law. *See* 8 C.F.R. § 1003.23(b)(4)(v).

22. Petitioner argues that in *Matter of Abdelghany*, the BIA held that an individual who did not plead guilty but was convicted after trial may nevertheless obtain relief under former Section 212(c). *See Matter of Abdelghany*, 26 I&N Dec. 256, 266-69 (BIA 2014). As of this writing, Petitioner’s second motion to reopen is still pending with the BIA.

23. On December 15, 2025, U.S. Immigration and Customs Enforcement ("ICE") arrested Petitioner at an ICE field office.

24. Shortly thereafter, Petitioner filed *Emergency Motion to Stay Removal Order*, with the BIA, which is still pending.

25. On December 23, 2025, Petitioner filed Petition for Writ of Habeas Corpus, challenging her illegal detention.

26. Since being detained, ICE/ERO personnel have visited Ms. Maryanovksy repeatedly and requested that she sign documents, without providing her or undersigned counsel copies of the documents, and without first notifying her attorney of record.

27. At this time, neither undersigned counsel or Petitioner have been informed of the nature, purpose, or legal consequence of the documents she is being asked to execute.

28. Additionally, on December 30, 2025, undersigned counsel sent an electronic message to ICE/ERO personnel, Leah J. Maher, requesting copies of any and all documentation that ICE/ERO personnel requested Petitioner to sign and execute. (*See Ex. A*). To date, ICE/ERO has not responded to undersigned counsel's request.

29. Furthermore, it should be noted that on November 25, 2025, a similarly situated detainee, Antonio Dejes Martinez Chavez, in consequence of undersigned counsel, on November 24, 2025, filing Petition for Writ of Habeas Corpus challenging Antonio Dejes

Martinez Chavez's detention at the Baker County Detention Center, was transferred outside of the Middle District of Florida, without notice to counsel, and prior to a final order being entered on his Petition for Writ of Habeas Corpus. *See Martinez Chavez v. Ripa et al*, Case No. 2:25-cv-1088.

30. Pursuant to M.D. Fla. L.R. 6.02(b), Petitioner has established by clear and convincing evidence an extraordinary circumstance not requiring notice. (*See Ex. A*).

LEGAL STANDARD

"A plaintiff seeking a preliminary injunction must establish that ... the balance of equities tips in [their] favor, and that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). The Court should grant a preliminary injunction if Petitioner establishes: (1) "a substantial likelihood of success on the merits," (2) "that the preliminary injunction is necessary to prevent irreparable injury," (3) "that the threatened injury outweighs the harm the preliminary injunction would cause the other litigant[s]," and (4) "that the preliminary injunction would not be averse to the public interest." *Chavez v. Fla. SP Warden*, 742 F.3d 1267, 1271 (11th Cir. 2014). The same test applies to a motion for a temporary

restraining order. *Schiavo ex rel. Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th Cir. 2005).

ARGUMENT

I. Petitioner's Re-detention is Invalid.

After Petitioner was released from immigration custody under an Order of Supervision (“OSUP”) pursuant to 8 C.F.R. Section 241.4, and periodically attending “check-in” appoints under the OSUP, since on or about September 29, 2009. Petitioner complied with all conditions of supervision, including reporting, residence requirements, and any additional conditions imposed by ICE. Because Petitioner’s removal could not be effectuated within the statutory removal period, ICE released her under an Order of Supervision pursuant to 8 C.F.R. § 241.4.

On or about December 15, 2025, ICE re-detained Petitioner under the pretense that her GPS Ankle Monitor was faulty, asking her to come to an unscheduled meeting at the Ft. Lauderdale ICE/ERO Sub Office where she was re-detained.

After Ms. Maryanovsky’s re-detention, ICE/ERO personnel have attempted to contact Petitioner on repeated occasions without providing her attorney of record notice. ICE/ERO have asked

Petitioner since her re-detention on December 15, 2025, to sign and/or execute documents, without informing undersigned counsel or Petitioner of the legal effect, purpose, or reason for requesting her signature. (*See Ex. A*).

The Due Process Clause prohibits deprivations of life, liberty, and property without due process of law. U.S. Const. amend. V. It is firmly established that these protections extend to noncitizens present in the United States. *Zadvydas v. Davis*, 533 U.S. 678, 693, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001) (“[T]he Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.”); *Wong Wing v. United States*, 163 U.S. 228, 238, 16 S.Ct. 977, 41 L.Ed. 140 (1896) (“It must be concluded that all persons within the territory of the United States are entitled to the protection guarantied by [the Fifth Amendment], and that even aliens shall not ... be deprived of life, liberty, or property without due process of law.”); *Trump v. J. G. G.*, — U.S. —, 145 S. Ct. 1003, 1006, 221 L.Ed.2d 529 (2025) (quoting *Reno v. Flores*, 507 U.S. 292, 306, 113 S.Ct. 1439, 123 L.Ed.2d 1 (1993)) (cleaned up) (“It is well established

that the Fifth Amendment entitles aliens to due process of law in the context of removal proceedings.”).

“Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty [the Due Process Clause] protects.” *Zadvydas*, 533 U.S. at 690, 121 S.Ct. 2491. Generally, the Due Process Clause “requires some kind of a hearing before the State deprives a person of liberty or property.” *Zinerman v. Burch*, 494 U.S. 113, 127, 110 S.Ct. 975, 108 L.Ed.2d 100 (1990). Even individuals who face significant constraints on their liberty or over whose liberty the government wields significant discretion retain a protected interest in their liberty. *See Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019) (“The fact that a decision-making process involves discretion does not prevent an individual from having a protectable liberty interest.”); *Hurd v. D.C., Gov’t*, 864 F.3d 671, 683 (D.C. Cir. 2017) (holding that re-detention after pre-parole conditional supervision requires a pre-deprivation hearing); *Gagnon v. Scarpelli*, 411 U.S. 778, 782, 93 S.Ct. 1756, 36 L.Ed.2d 656 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471, 482, 92 S.Ct. 2593, 33 L.Ed.2d 484 (1972) (same, in parole context).

Applying these principles, it is clear that Ms. Maryanovsky has a protected liberty interest in being free from official restraint. Respondent(s) are unlawfully re-detaining Petitioner under 8 U.S.C. § 1231, without following the regulations it implemented at 8 C.F.R. §§ 241.4 and 241.13. Respondent(s) failed to provide Petitioner with notice of the reasons for revoking her supervision, did not conduct a prompt informal interview, and did not provide an opportunity to contest the alleged grounds for re-detention. As a result, Petitioner's continued redetention is unconstitutional.

ICE, like any agency, "has the duty to follow its own federal regulations." *Haoud v. Ashcroft*, 350 F.3d 201, 205 (1st Cir. 2003) (quoting *Nelson v. I.N.S.*, 232 F.3d 258, 262 (1st Cir. 2000)). To be sure, not every procedural misstep raises a constitutional issue. See *Matias v. Sessions*, 871 F.3d 65, 72 (1st Cir. 2017) (involving an inaccurate translation). However, where an immigration "regulation is promulgated to protect a fundamental right derived from the Constitution or a federal statute," like the opportunity to be heard, "and [ICE] fails to adhere to it, the challenged [action] is invalid" *Waldron v. I.N.S.*, 17 F.3d 511, 518 (2d Cir. 1993); see also *Ying Fong v. Ashcroft*, 317 F.Supp.2d 398, 403–04 (S.D.N.Y. 2004) (granting

alien's habeas petition where she was deported fewer than 72 hours after her arrest and regulation mandated 72-hour rule).

Against this backdrop, this Court must address the question presented here which is to determine if Petitioner was afforded the necessary due process required to protect her fundamental right to be free from unnecessary government restraint.

A protected liberty interest may arise from a conditional release from physical restraint. *Young v. Harper*, 520 U.S. 143, 147–49 (1997). Even when a statute allows the government to arrest and detain an individual, a protected liberty interest under the Due Process Clause may entitle the individual to procedural protections not found in the statute. *See id.* (due process requires pre-deprivation hearing before revocation of preparole); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972) (same, in parole context).

To determine whether a specific conditional release rises to the level of a protected liberty interest, “[c]ourts have resolved the issue by comparing the specific conditional release in the case before them with the liberty interest in parole as characterized by *Morrissey*.”

Gonzalez-Fuentes v. Molina, 607 F.3d 864, 887 (1st Cir. 2010) (internal quotation marks and citation omitted).

In *Morrissey*, the Supreme Court explained that parole from a criminal conviction “enables [the parolee] to do a wide range of things open to persons” who have never been in custody or convicted of any crime, including to live at home, work, and “be with family and friends and to form the other enduring attachments of normal life.” *Morrissey*, 408 U.S. at 482. “Though the [government] properly subjects [the parolee] to many restrictions not applicable to other citizens,” such as monitoring and seeking authorization to work and travel, his “condition is very different from that of confinement in a prison.” *Id.* “The parolee has relied on at least an implicit promise that parole will be revoked only if he fails to live up to the parole conditions.” *Id.* The revocation of parole undoubtedly “inflicts a grievous loss on the parolee.” *Id.* (quotations omitted). Therefore, a parolee possesses a protected interest in his “continued liberty.” *Id.* at 481–84.

In the instant case, Petitioner's parole from detention is similar. For nearly a decade, it allowed her to establish ties in the community while pursuing relief in her removal proceedings. She received

employment authorization, was gainfully employed, and supported her family. These actions were made possible by Petitioner's freedom, which is “the most elemental of liberty interests[.]” *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004).

Ms. Maryanovsky would be deprived of her due process protections under the Fifth Amendment if she were transferred outside of this Court’s jurisdiction, without first determining if ICE/ERO’s re-detention was valid. Therefore, Ms. Maryanovsky has a due process right to have her Petition for Writ of Habeas Corpus decided prior to being transferred or removed out of this Court’s jurisdiction.

Although the Government has a legitimate interest in the “prompt execution of removal orders,” *Hernandez-Lara v. Lyons*, 10 F.4th 19, 32 (1st Cir. 2021), “there is a public interest in preventing aliens from being wrongfully removed, particularly to countries where they are likely to face substantial harm,” *Nken v. Holder*, 556 U.S. 418, 436 (2009).

Because Respondent’s improperly re-detained Ms. Maryanovsky without providing her the due the process protections afforded in 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13,

ICE/ERO's re-detention of Petitioner is invalid. Additionally, Respondent(s) have not identified any violation of supervision conditions, new removal prospects, or changed circumstances justifying re-detention under the governing regulations.

As such she is seeking this Court to enjoin the Respondent's from transferring her outside of this Court's jurisdiction until such time as either she is released from custody; and/or this Court enters a final order on her Petition for Writ of Habeas Corpus.

II. Respondent(s) Illegal Detention of Maryanovsky Causes Petitioner Irreparable Harm

"It is well established that the deprivation of constitutional rights unquestionably constitutes irreparable injury." *Gayle v. Meade*, 614 F. Supp. 3d 1175, 1205 (S.D. Fla. 2020). Without interim relief to maintain the status quo, Petitioner could be deported or removed from this Court's jurisdiction, effectively foreclosing any recourse. *See, e.g., Zapeta v. Exec. Dir. of the Fla. Div. of Emergency Mgmt.*, No. 2:25-CV-00697-JLB-KCD, 2025 WL 2432501, at *3 (M.D. Fla. Aug. 22, 2025) (denying habeas petition as moot where petitioner had been deported because, "[a]s a general rule, a habeas petition

presents a live case or controversy only when a petitioner is in custody”).

The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Petitioner has a fundamental interest in liberty and being free from official restraint. The government’s detention of Petitioner without following the due process protections contained in 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13 violates her right to due process.

Leaving Petitioner in prolonged detention at a dangerous facility where she is unable to contact counsel to communicate medical issues and other urgent problems places them at serious risk of prolonged detention, injury, and death—all of which are irreparable. *Fla. Immigrant Coal. v. Uthmeier*, No. 25-21524-CV, 2025 WL 1423357, at *12 (S.D. Fla. Apr. 29, 2025) (finding the risk of unlawful “detention” supported irreparable harm).

III. The Balance of Equities and the Public Interest Weigh Heavily in Petitioner's Favor

Lastly, the balance of equities and public interest heavily favors Petitioner's request for injunctive relief. Petitioner is only requesting that this Court Order that she remain within its jurisdiction until his habeas petition is decided, and/or she is released from custody. Thus, the harm to the Government is minimal. And because Ms. Maryanovksy is being illegally re-detained pursuant to 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13, neither equity nor the public's interest are furthered by holding her under an invalid agency decision. *See Nken v. Holder*, 556 U.S. 418, 436 (2009) ("Of course there is a public interest in preventing aliens from being wrongfully removed[.]").

IV. The Court Should Not Require Petitioner to Provide Security Prior to the Temporary Restraining Order

Federal Rule of Civil Procedure 65(c) provides that "[t]he court may issue a preliminary injunction or a temporary restraining order only if the movant gives security in an amount that the court considers proper to pay the costs and damage sustained by any party found to have been wrongfully enjoined or restrained." Decisions regarding the security required to be posted in connection with the

issuance of preliminary relief “are entrusted to the discretion of the district court,” including the discretion to “elect to require no security at all.” *Transcon. Gas Pipe Line Co., LLC v. 6.04 Acres*, 910 F.3d 1130, 1171 (11th Cir. 2018) (quoting *Corrigan Dispatch Co. v. Casa Guzman, S. A.*, 569 F.2d 300, 303 (5th Cir. 1978)). District courts exercise this discretion to require no security in cases brought by indigent, detained, and/or incarcerated people, those seeking to exercise their constitutional rights, and in cases that benefit the public interest. *See, e.g. Campos v. I.N.S.*, 70 F. Supp. 2d 1296, 1310 (S.D. Fla. 1998); *Complete Angler, LLC v. City of Clearwater, Fla.*, 607 F. Supp. 2d 1326 (M.D. Fla. 2009); Wright & Miller, Fed. Practice & Proc. § 2954.

This court should do so here.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court temporarily enjoin the Respondent(s) from the following:

- a. denying Ms. Maryanovsky from release on the basis that she is subject to mandatory detention pursuant to § U.S.C. § 1231;
- b. continuing to detain Ms. Maryanovsky under an invalid agency decision that failed to provide Petitioner with notice of the reasons for revoking her supervision, did

not conduct a prompt informal interview, and did not provide an opportunity to contest the alleged grounds for re-detention;

c. transferring or relocating Ms. Maryanovsky outside the jurisdiction of the Middle District of Florida pending a ruling on the habeas petition; and


d. Grant any other and further relief that this Court deems just and proper.

DATED this 2nd day of January, 2026.

By: /s/Joel Alexis Caminero
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I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all counsel in this case on January 2, 2026.

/s/Joel Alexis Caminero
Joel Alexis Caminero, Esq.
Florida Bar # 127294
Attorney for Petitioner

 Outlook

Fwd: ISABELLA MARYANOVSKY A 

From Joel Caminero <joel@caminerolawfirm.com>

Date Wed 12/31/2025 5:24 PM

 1 attachment (526 KB)

G28.pdf;

Begin forwarded message:

From: Joel Caminero <joel@caminerolawfirm.com>

Subject: ISABELLA MARYANOVSKY A 

Date: December 30, 2025 at 2:26:23 PM EST

To: "Leah.J.Maher@lce.dhs.gov" <Leah.J.Maher@lce.dhs.gov>

Good afternoon DO Maher,

I represent the above-referenced Respondent. A Form G-28 reflecting my appearance was filed through the ERO Portal on December 23, 2025. Courtesy copy attached.

Ms. Maryanovsky has contacted me to advise that ICE/ERO personnel are requesting that she sign documents, without providing her or counsel with copies, and without first contacting me as her attorney of record. At this time, neither Ms. Maryanovsky nor I have been informed of the nature, purpose, or legal effect of the documents she is being asked to execute. This has now occurred on two separate occasions, while being actively represented by legal counsel.

Please immediately provide copies of any and all documents ICE/ERO is requesting that Ms. Maryanovsky sign so that I may review them with my client and advise her accordingly. Any attempt to obtain signatures from a represented individual without affording counsel the opportunity to review the documents raises serious due process and attorney-interference concerns.

Ms. Maryanovsky has expressly requested that ICE/ERO communicate through counsel regarding any documentation requiring her signature. Continued efforts to bypass counsel will be documented. As you are aware, a Petition for Writ of Habeas Corpus is currently pending, and I will promptly advise the District Court of any ICE/ERO actions that implicate interference with counsel or disregard for representation rights.

Please confirm in writing that no documents will be presented for signature until counsel has reviewed them, and provide the requested copies without delay or forward this email to your litigation counsel.

Thank you for your prompt attention to this matter.

Joel Alexis Caminero, Esq.
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Please allow 48-72 business hours for a reply. We are also able to receive SMS (text messages). Please e-mail us directly, call our office at 407-401-9737, or send an SMS (text message). Thank you.

Por favor, permita de 48 a 72 horas hábiles para recibir una respuesta. También podemos recibir mensajes de texto (SMS). Puede enviarnos un correo electrónico directamente, llamar a nuestra oficina al 407-401-9737 o enviarnos un mensaje de texto (SMS). Gracias.

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