

LAW OFFICES **KARP, NORWIND, GOLD KARP, P.A.**

2273 Research Blvd.
Suite 200
Rockville, MD 20850
Tel.: 301.948.3800
Fax: 301.948.5449
www.karplawfirm.net

Additional Files
Web Content
Attachments
Emails
Signatures

Hon. Brendan A. Hurson
United States District Judge
101 West Lombard Street
Baltimore, Maryland 21201

January 23, 2026

Re: *Vicente Romero v. Bondi et al.*
Civil No. 26-219-BAH

Ronald A. Karp ^{VO}
Edward L. Norwind ^{VO}
Jack A. Gold ^{VO}
Andrew A. Karp ^{VO}
Zachary W.J. King ^{VO}
O. Adrian Meza ^{VO}
Allia Borowski ^{VO}

Dear Hon. Brendan A. Hurson, Esq.,

Petitioner, through counsel, consents to expedited review of the petition in this matter without a full briefing schedule, and would ask the Court to consider the same recent cases it cited in the letter – namely, *Ailon-Lopez v. Bondi*, Civ. No. 26-160-BAH, and *Arevalo-Ixam v. Noem*, Civ. No. 26-081-BAH.

Of Counsel

John P. Kudel ^{VA}
Steve Chaikin ^{VO}
David L. Scull ^{VO}
Herbert Chris Gordon ^O

Petitioner believes that the language in paragraph seven, requiring a bond hearing be held within 14 days, ought to be part of this Court’s order, as otherwise Petitioner’s Fifth Amendment procedural due process rights would be irreparably harmed, given present substantial delays in the Immigration Courts.

It bears noting that many judges nationwide have, in dealing with the remedy for the same unlawful detention (incorrectly asserted to be under Section 1225(b), actually under 1226(a), but without a warrant as required under 1226(a)) addressed in this Petition, are placing shorter temporal limitations on the provision of a constitutionally adequate bond hearing, such as 7 days. See, e.g., *Aguilon Fuentes v. Bondi et al*, No. 1:26-cv-00167-AJT-WF (E.D. Va. Jan. 23, 2026). Many Courts are ordering that the burden of proof be placed on the government in any bond hearing, and that ability to pay and alternatives to detention be considered. See *Adejola v. Barr*, 408 F. Supp. 3d 284, 287 (W.D.N.Y. 2019). Indeed, a growing number of courts are even ordering immediate release in the first instance. See, e.g., *A.E.R.T. v. Wofford*, No. 1:25-cv-01824-KES-SKO (HC) (E.D. Cal. Dec. 16, 2025); *Chogllo Chafra v. Scott*, No. 2:25-CV-00437-SDN, 2025 WL 2688541, at *11 (D. Me. Sept. 22, 2025).

Respectfully submitted,

Allia Borowski

Counsel for Petitioner

o District of Columbia Bar

v Maryland Bar

* Virginia Bar

John P. Kudel, Esq.
Steve Chaikin, Esq.
David L. Scull, Esq.
Herbert Chris Gordon, Esq.