IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-00385-NYW-TPO

JOSE LARA MEJIA,

Petitioner,

v.

JUAN BALTAZAR, Warden of the Aurora Contract Detention Facility, in his official capacity;
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT;
ROBERT GUADIAN, Director of the Denver Field Office of Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement, in his official capacity;
MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security, in his official capacity;
TODD LYONS, Acting Director of U.S. Immigration and Customs Enforcement, in his official capacity;
PAMELA BONDI, Attorney General of the United States, in her official capacity;
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW;
SIRCE OWEN, Acting Director for Executive Office of Immigration Review, in her official capacity; and
U.S. DEPARTMENT OF HOMELAND SECURITY,

Respondents.

PETITIONER'S MOTION TO ENFORCE JUDGMENT

Petitioner Jose Lara Mejia ("Mr. Lara Mejia" or "Petitioner"), through undersigned counsel, respectfully requests that the Court enforce its March 17, 2026, Memorandum Opinion and Order granting habeas relief (Dkt. No. 17) ("Order"). In that Order, this Court held that Mr. Lara Mejia's detention without a bond hearing violated both the Immigration and Nationality Act and the Due Process Clause. *Id.* at 6–7. The Court ordered Respondents to provide a bond hearing under 8 U.S.C. § 1226(a) at which the Government would bear the burden of proving, by clear and convincing evidence, that continued detention is justified because he is a danger to the community or a flight risk. *See id.* at 8–9.

Although a hearing was subsequently held, Respondents failed to comply with the Court's Order. First, Respondents failed to comply with the Order by permitting the Immigration Judge ("IJ") to conduct the bond hearing without requiring the Government to present clear and convincing evidence proving that Mr. Lara Mejia is a danger to the community or a flight risk. Second, Respondents failed to comply by effectively shifting the burden to Mr. Lara Mejia to prove he is not a danger to the community or a flight risk, directly contrary to the Court's Order.

At the hearing, the Government presented no meaningful evidence. Nor did the IJ apply the required burden and standard set forth by this Court, culminating in a conclusory decision utterly devoid of individualized analysis. This was not the constitutionally compliant hearing the Court ordered. Because Respondents failed to comply with this Court's Order, continued detention is unlawful.

This Court's intervention is necessary to ensure compliance with its Order and to direct appropriate relief. Mr. Lara Mejia respectfully requests that this Court enforce its Order and direct his immediate release. In the alternative, Petitioner requests a new bond hearing before a different Immigration Judge with explicit instructions ensuring compliance with the Court's Order, ensuring that the government bears their burden of proof.

PROCEDURAL BACKGROUND

On January 30, 2026, Mr. Lara Mejia filed the Petition alleging that his detention is unlawful because (i) Respondents are unlawfully keeping him in mandatory detention under 8 U.S.C. § 1225(b)(2)(A) rather than the applicable statute, 8 U.S.C. § 1226(a), which provides for a bond hearing and (ii) because mandatory detention in his case violates his due process rights under the Fifth Amendment to the United States Constitution. In conjunction with his

Petition, Petitioner also filed a Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 5).

On March 17, 2026, this Court issued its Memorandum Opinion and Order granting the Petition. (Dkt. No. 17). The Court held that Mr. Lara Mejia is detained under 8 U.S.C. § 1226(a), which entitles him to an individualized bond hearing, and that his continued detention without such a hearing violated both the INA and the Due Process Clause. Order at 6–7. The Court ordered Respondents to provide Mr. Lara Mejia with a bond hearing no later than March 24, 2026, at which "the Government shall bear the burden of proving, by clear and convincing evidence, that Petitioner's continued detention is justified." *Id.* at 9.

On March 19, 2026, Respondents conducted a bond hearing before the Aurora Immigration Court before Judge Irene Feldman. At that hearing, the Government presented no witnesses and relied primarily on an inaccurate and disputed arrest record. Mr. Lara Mejia submitted exhaustive evidence rebutting that record, including certified court dispositions and an updated criminal background report, as well as substantial evidence demonstrating his eligibility for release, including his lack of recent criminal history, long-term residence in the United States, and approved I-130 petition and I-601A waiver. As reflected in the audio recording of the hearing, the IJ questioned Petitioner directly regarding his prior criminal convictions from more than twenty years ago and the DHS attorney questioned Petitioner regarding driving without a driver's license. *See* Hr'g Recording, submitted as **Exhibit A**, at 8:23-21:59.

Despite this undeveloped record, the IJ denied bond, concluding that the Government met its burden to establish that Mr. Lara Mejia posed a flight risk and danger to the community, and further finding that Mr. Lara Mejia failed to demonstrate that he was not a flight risk or danger.

See Order Denying Bond, **attached as Exhibit B**, at 1. The IJ did not provide a meaningful explanation of how the Government satisfied the high burden set by this Court. *See id.* Nor did the IJ engage in an individualized analysis of the relevant factors.

As of this filing, Mr. Lara Mejia remains detained at the Aurora Contract Detention Facility in violation of this Court's March 17, 2026, Order. Petitioner now files this Motion to Enforce Judgment. Counsel for Mr. Lara Mejia has provided notice of this intent to file this Motion to Enforce Judgment to the U.S. Attorney's Office for the District of Colorado on March 24, 2026. Respondents do not oppose this motion.

ARGUMENT

I. THIS COURT HAS JURISDICTION TO ENFORCE ITS ORDER, AND EXHAUSTION IS NOT REQUIRED.

As an initial matter, this Court has jurisdiction to enforce the Order. In opposing this motion, Respondents may contend that (1) this Court lacks jurisdiction because the Immigration Judge's bond determination is discretionary and unreviewable under 8 U.S.C. § 1226(e), and (2) Mr. Lara Mejia failed to exhaust administrative remedies by appealing to the Board of Immigration Appeals. Neither argument has merit.

A. This Court Retains Jurisdiction to Enforce Its Habeas Order.

This Court has inherent authority to enforce its own orders. *See Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) (courts possess inherent power to ensure compliance with their lawful mandates). This authority derives not "by rule or statute but by the control necessarily vested in courts to manage their own affairs so as to achieve the orderly and expeditious disposition of cases." *Id.* (quoting *Link v. Wabash R.R. Co.*, 370 U.S. 626, 630-31 (1962)).

This motion asks the Court to exercise that inherent authority. Importantly, the present motion does not ask this Court to reweigh the IJ's discretionary determination.[1] It asks the Court to enforce its prior Order. Respondents detained Mr. Lara Mejia for weeks under § 1225(b) without a bond hearing. This Court granted habeas relief and ordered that Mr. Lara Mejia be provided a bond hearing under § 1226(a), subject to specific procedural requirements, notably including that the Government bears the burden of proof by clear and convincing evidence. Respondents failed to do so, in direct contravention of the Court's Order.[2] In light of Respondents' disregard for the Court's Order, the Court has the authority to enforce it.

Removing any doubt as to the Court's jurisdiction, this Court expressly retained jurisdiction over this matter. In its Order, the Court required Respondents to file a status report following the bond hearing identifying the result and basis for any denial. Order at 9 (ordering the parties to file a joint status report on or before March 31, 2026 concerning "the results of any bond hearing that was conducted"). Further, the Court specifically ordered the parties to address

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[1] This case does not involve a routine challenge to a discretionary bond determination. If Mr. Lara Mejia had simply been denied bond in the ordinary course of removal proceedings, § 1226(e) would bar review of that discretionary decision. *See* 8 U.S.C. § 1226(e); *Mwangi v. Terry*, 465 F. App'x 784, 786–87 (10th Cir. 2012). But as set forth above, that is not what occurred here.

[2] Respondents cannot escape this conclusion simply because the IJ referenced the Government as potentially carrying the burden of proof. As courts have recognized, "[m]erely stating the proper standard does not discharge the obligation to correctly apply the standard." *Akinsanya v. Garland*, 125 F.4th 287, 296 (1st Cir. 2025). Here, the IJ did not state the proper standard, let alone apply it. Instead, the IJ stated that "[i]f DHS bears the burden, the Court finds that DHS has met its burden." Ex. B at 1. It also maintained that "[i]f [Mr. Lara Mejia] bears the burden, the Court finds that [Mr. Lara Mejia] has not met his burden." *Id.* The IJ thus never expressly accepted this Court's mandate that the Government bear the burden of proof by a clear and convincing evidence. To the extent the Court referenced the Government potentially "bear[ing] the burden," the IJ failed to properly apply the standard, as set forth below. *Infra* § II. This Court retains jurisdiction to ensure the correct legal standard is upheld as required by the Order.

in their status report "*whether any additional proceedings in this matter are required.*" *Id.* (emphasis added). The Court thus explicitly contemplated continued oversight over the case to enforce of its Order. This motion therefore falls squarely within the Court's expressly retained authority.

Accordingly, this Court has jurisdiction to determine whether its Order was followed and to order appropriate relief.

B. Exhaustion Is Not Required and Would Be Inappropriate.

Respondents may also argue that Petitioner was required to exhaust administrative remedies by appealing the bond denial to the Board of Immigration Appeals. That argument fails for two independent reasons.

First, exhaustion is not statutorily required in this context. In the immigration context, "exhaustion of remedies is statutorily required only for appeals of final orders of removal." *Quintana Casillas v. Sessions*, No. 17-cv-01039-DME-CBS, 2017 U.S. Dist. LEXIS 113377, at *20–21 (D. Colo. Jul. 20, 2017) (quoting *Hoang v. Comfort*, 282 F.3d 1247, 1254 (10th Cir. 2022)). Because Petitioner challenges the procedures employed by the IJ at his bond hearing, exhaustion is merely prudential rather than a jurisdictional issue. *See generally Molina Ochoa v. Noem*, No. 1:25-cv-00881-JB-LF, 2025 U.S. Dist. LEXIS 220632, at *29, *32 (D.N.M. Nov. 7, 2025) (finding that exhaustion was not a bar to consideration of habeas petition challenging denial of a bond hearing). Accordingly, whether to require exhaustion is a matter of judicial discretion. *Id.* at *29–30; *L.G. v. Choate*, 744 F. Supp. 3d 1172, 1181 (D. Colo. 2024). Therefore, because Petitioner is challenging his bond hearing's procedures, exhaustion is not a bar to this motion.

Second, even where exhaustion is prudential, courts may excuse it when exhaustion would be futile or would exacerbate ongoing harm. *See McCarthy v. Madigan*, 503 U.S. 140, 146 (1992). Those circumstances are present here. Petitioner has already obtained habeas relief from this Court. He now seeks enforcement of that relief. Requiring him to pursue an administrative appeal—while he remains detained pursuant to a hearing that did not comply with this Court's Order— is futile because it would defeat the purpose of habeas review.

Furthermore, the BIA takes months to adjudicate detained appeals. Requiring Petitioner to wait for that process to unfold would prolong the very injury this Court has already recognized: unlawful detention without a constitutionally compliant bond determination. Courts have routinely declined to require exhaustion under similar circumstances where doing so would perpetuate unlawful detention. *See, e.g.*, *Lopez-Arevalo v. Ripa*, 801 F. Supp. 3d 668, 680 (W.D. Tex. 2025) (declining to require exhaustion because delay "would exacerbate his alleged constitutional injury—detention without a [proper] bond hearing"); *Rodriguez v. Bostock*, 779 F. Supp. 3d 1239, 1253-54 (W.D. Wash. 2025). Petitioner's individual interest in "immediate judicial review" therefore outweighs the "countervailing institutional interests favoring exhaustion," and the Court can address the merits of this motion. *McCarthy*, 503 U.S. at 146.

Because Mr. Lara Mejia challenges Respondents' failure to comply with a federal court order and ongoing unconstitutional detention, this Court has jurisdiction to enforce its Order, and exhaustion is neither required nor appropriate. The Court should therefore proceed to the merits of Mr. Lara Mejia's Motion to Enforce.

II. THE IMMIGRATION JUDGE FAILED TO COMPLY WITH THIS COURT'S ORDER, AND PETITIONER IS ENTITLED TO A NEW BOND HEARING.

This Court ordered that, at Mr. Lara Mejia's bond hearing, "the Government shall bear the burden of proving, by clear and convincing evidence, that Petitioner's continued detention is justified." Order at 9. In imposing that requirement, the Court expressly departed from the ordinary framework governing immigration bond proceedings, where the noncitizen bears the burden of proving that he is not a flight risk or danger to the community. *See id.* at 8–9 (explaining "the Court continues to concur with other cases in this District that have required the Government to bear the burden of proof at a § 1226(a) bond hearing where, as here, the petitioner is initially erroneously detained under § 1225" (collecting cases)).

Respondents have failed to follow the Court's order. Instead of requiring the Government to satisfy its burden of proof by clear and convincing evidence, the IJ placed the burden of proof on Mr. Lara Mejia. Mr. Lara Mejia remains unlawfully detained, and this Court must intervene.

A. The IJ did not hold the Government to the burden the Court ordered.

The Court ordered Respondents to carry the burden of demonstrating by clear and convincing evidence at a bond hearing that Mr. Lara Mejia's continued detention is justified. *See* Order at 9. The clear and convincing evidence standard is a "stringent burden of proof." *Cruz-Garza v. Ashcroft*, 396 F.3d 1125, 1130 (10th Cir. 2005). "Clear and convincing evidence is evidence that 'could place in the ultimate factfinder an abiding conviction that the truth of its factual contentions are "highly probable."'" *Sala v. United States*, 552 F. Supp. 2d 1157, 1162 (D. Colo. 2007) (quoting *Colorado v. New Mexico*, 467 U.S. 310, 316 (1984)). It "leaves no substantial doubt" in the factfinder's mind, establishing "not only [that] the proposition at issue is probable, but also that it is highly probable." *Id.* (alteration in original).

As an initial matter, it is doubtful that the IJ even attempted to apply this standard in reaching its ruling. In its order, the IJ never mentions the clear and convincing evidence standard. *See* Ex. B at 1–2. Nor does the IJ actually commit, as this Court required, to the Government bearing the burden of proof. *See id.* Instead, the IJ opined that "*If DHS bears the burden*, the [IJ] finds that DHS has met its burden to establish that the respondent is both a danger and a flight risk." *Id.* at 1 (emphasis added). And contrary to this Court's order, the IJ further reasoned that if Mr. Lara Mejia bears the burden, "the [IJ] finds that [he] has not met his burden to establish that he is neither a danger to the community nor a significant flight risk such that release from custody is warranted." *Id.* Thus, the IJ did not even expressly purport to apply the Court's ruling.

Even if the IJ *did* sufficiently state it was applying the clear and convincing evidence standard, it failed to do so in practice. Again, "[m]erely stating the proper standard does not discharge the obligation to correctly apply the standard." *Akinsanya*, 125 F.4th at 296. Here, the very limited evidence the Government submitted did not meet its burden of "leav[ing] no substantial doubt" that Mr. Lara Mejia is a danger or flight risk. *See Sala*, 552 F. Supp. 2d at 1162. The IJ's conclusion that the Government "met its burden," notwithstanding the Government's paltry, unreliable evidence, demonstrates that the IJ did not apply the clear and convincing evidence standard. *See* Ex. B. at 1.

Prior to the hearing, DHS submitted a single document: a Form I-213 that contained multiple material inaccuracies, including: (1) mischaracterizing a dismissed charge from 2000 as a conviction; (2) misstating the date of a conviction by nearly 20 years; and (3) incorrectly indicating that Mr. Lara Mejia had no spouse or children. *See* Government's Submission of Evidence, attached as **Exhibit C**, at 5–6. These statements are untrue, as Mr. Lara Mejia's

evidence amply demonstrated. *See* Resp. to Government Submission of Evidence, **attached as Exhibit D**, at 3 (describing and attaching "independent, government-issued record[s] directly contradict[ing] DHS's submission), 10–23 (marriage and birth certificates for Mr. Lara Mejia's marriage and four children).

Given these inaccuracies, the Government's evidence was unreliable. The Form I-213 was an unsworn series of allegations, and its author was not present in court or otherwise presented for cross examination. *See generally* Ex. A. It is unclear what their credentials were.

Indeed, the Government did not call any witnesses. *See generally id.* Nor did it submit any additional documentary evidence. It presented no evidence addressing flight risk beyond generalized questioning. *See generally id.*

After DHS rested, Mr. Lara Mejia—despite bearing no burden—presented a proffer addressing the relevant factors, including those identified in *Matter of Guerra. In re Guerra*, 24 I. & N. Dec. 37, 40 (B.I.A. 2006); Ex. A at 3:16-7:32, 22:35-24:03. These factors may include any or all of the following:

> (1) whether the alien has a fixed address in the United States; (2) the alien's length of residence in the United States; (3) the alien's family ties in the United States, and whether they may entitle the alien to reside permanently in the United States in the future; (4) the alien's employment history; (5) the alien's record of appearance in court; (6) the alien's criminal record, including the extensiveness of criminal activity, the recency of such activity, and the seriousness of the offenses; (7) the alien's history of immigration violations; (8) any attempts by the alien to flee prosecution or otherwise escape from authorities; and (9) the alien's manner of entry to the United States.

Id. Mr. Lara Mejia rebutted the inaccuracies submitted by DHS with substantial evidence, including: (1) certified court dispositions; (2) an updated Colorado Bureau of Investigation

report; (3) documentation of his U.S. citizen spouse and children; and (4) evidence of his family and community ties. *See generally* Ex. D.

The IJ then questioned Mr. Lara Mejia regarding arrests from more than 20 years ago and permitted DHS to ask limited questions unrelated to flight risk. *See* Ex. A at 18:57-20:43.

Again, at no point did the Government present affirmative evidence establishing that Mr. Lara Mejia poses a flight risk or danger to the community, let alone evidence sufficient to satisfy the stringent clear and convincing standard. The IJ's conclusion that the Government met its burden—notwithstanding the complete dearth of evidence proffered by the Government—demonstrates that the IJ failed to apply the stringent clear and convincing evidence standard, contrary to this Court's Order.

B. The IJ effectively placed the burden on Mr. Lara Mejia in the first instance.

As explained above, the IJ stated in her order that *if* the Government bears the burden, the Government "met its burden to establish that [Mr. Lara Mejia] is both a danger and a flight risk." Ex. B at 1. This statement is mere lip service. Neither the hearing itself, nor the content of the IJ's written order, substantiate this claim. *See NRDC, Inc. v. Pritzkerv*, 828 F.3d 1125, 1135 (9th Cir. 2016) ("An agency acts contrary to the law when it gives mere lip service or verbal commendation of a standard but then fails to abide the standard in its reasoning and decision.").

In failing to hold the Government to the burden this Court imposed, the IJ effectively placed this burden on Mr. Lara Mejia. Again, the Government's only documentary evidence was demonstrably incorrect and unreliable, and the Government called no witnesses. *See supra* § II.A. Although Mr. Lara Mejia did not carry the burden of proof, he rebutted the Government's faulty showing with competent evidence. *See* Ex. D.

At the hearing, the IJ discussed the evidence submitted by both parties interchangeably. *See* Ex. A at 26:48-29:00 (only mentioning the evidence to state the court views it in the best possible light before ruling). As a result, the IJ's decision reflects a generalized, holistic weighing of the record as a whole. While this approach may be appropriate in a bond hearing where the noncitizen bears the burden of proof, it is incompatible with the Government bearing the burden of proof by a clear and convincing evidence standard. *See, e.g.*, Order, *Arredondo v. Baltazar*, No. 1:25-cv-03040-RBJ, ECF No. 26 at 13 (D. Colo. Dec. 18, 2025) (ordering a new bond hearing where the IJ's determination "was based on a holistic weighing of all the evidence in the record—both that supplied by [Petitioner] as well as that provided by the government—in a way that is impossible to disaggregate or disentangle"). Put differently, the Government was required to meet the evidentiary standard on its own, yet nothing in the IJ's decision shows that the Government met its burden on the Government's evidence alone. By assessing both parties' evidence interchangeably, the IJ effectively shifted the burden back to Mr. Lara Mejia. This burden-shifting directly contravenes this Court's Order that required the IJ to hold the Government to its stringent burden of proof.

The IJ's reasoning—both oral and written—hearing further demonstrates that the IJ improperly placed the burden on Mr. Lara Mejia. The IJ did not identify what evidence satisfied the Government's burden, how that evidence meets the stringent clear and convincing evidence standard, or what factors support the conclusion that Mr. Lara Mejia poses an unacceptable flight risk or danger. *See* Ex. A at 26:48-29:00; Ex. B at 1. Instead, the IJ appeared to have required Mr. Lara Mejia to prove he was not a danger or a flight risk. Indeed, the IJ suggested as much, reasoning that "[i]f [Mr. Lara Mejia] bears the burden, the Court finds that [he] has not met his

burden to establish that he is neither a danger to the community nor a significant flight risk such that release from custody is warranted." Ex. B. at 1. As this Court made clear, that burden was not Mr. Lara Mejia's to bear. The IJ violated this Court's Order in proceeding otherwise.

The IJ's reasoning does not comport with the burden that this Court ordered the IJ to apply. Absent intervention from this Court, the Court's Order will be vitiated.

C. The record confirms that the government's evidence could not have satisfied its burden.

Nothing in the IJ's decision suggests that the Government's evidence—standing alone—established, by clear and convincing evidence, that Mr. Lara Mejia is a flight risk or danger to the community. To the contrary, the structure and content of the decision indicate that the IJ relied on a combined assessment of all evidence, including Mr. Lara Mejia's own submissions, rather than requiring the Government to meet its burden independently.

Specifically, the record relied upon by the IJ's decision rests on factors to which DHS failed to submit any evidence or argument. The undisputed record and the factors introduced in *Matter of Guerra* support Mr. Lara Mejia, including two misdemeanor convictions over 20 years old, no criminal history in over 20 years, long-term residence in the United States (since 1999), a U.S. citizen spouse and children; and an approved I-130 petition and I-601A waiver, with a pending immigrant visa process. *See* 24 I. & N. Dec. at 40 The BIA has recognized that a noncitizen's available avenues for lawful status are highly relevant to flight risk. Yet DHS presented no evidence addressing this factor. DHS's lack of evidence failed by far to meet the clear and convincing standard. The IJ's ruling in the face of this insufficient evidence reflects a failure to abide by this Court's Order.

D. The Court should order Mr. Lara Mejia's release or, in the alternative, a new bond hearing.

In light of Respondents' violation of the Court's Order, the Court should enforce its Order by requiring Mr. Lara Mejia's immediate release. In the alternative, the Court should require a new bond hearing that Complies with its Order.

In its Order, the Court explained that "[i]f Respondents [d]o not provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a) *as required herein*, he must be immediately released from detention." Order at 9 (emphasis added). And as set forth above, the Court required that the bond hearing would impose upon the Government "the burden of proving, by clear and convincing evidence, that Petitioner's continued detention is justified." *Id.* The bond hearing did no such thing. Because Respondents failed to provide Mr. Lara Mejia "with a bond hearing under 8 U.S.C. § 1226(a) as required [by the Order], he must be immediately released from detention." *Id.*

In the alternative, to enforce the Order, the Court should require a new bond hearing. At that new hearing, the IJ must place the burden of clear and convincing evidence on the Government. Specifically, at that hearing, the IJ must: (1) require the Government to present evidence first; (2) determine whether the Government's evidence, standing alone, satisfies the clear and convincing standard; and (3) *only then* consider any rebuttal evidence offered by Petitioner. *See* Order, *Arredondo v. Baltazar*, No. 1:25-cv-03040-RBJ, ECF No. 26 at 15–16 (D. Colo. Dec. 18, 2025) (granting motion to enforce judgment and ordering respondents to provide a "new bond hearing" at which the IJ must "determine whether the government's evidence, standing alone, meets [its] burden"). Absent these safeguards, the burden-shifting framework ordered by this Court is rendered meaningless.

Accordingly, the Court should order Mr. Lara Mejia's immediate release, or in the alternative, a compliant bond hearing.

CONCLUSION

For the foregoing reasons, Mr. Lara Mejia respectfully requests the Court enforce its March 17, 2026 Order by ordering his immediate release or, in the alternative, directing new bond hearing that complies with the Order.

Dated April 7, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2026, I have caused to be electronically filed the foregoing with the Clerk of Court using CM/ECF system which will send notification of such filing to counsel of record.

I further hereby certify that on April 7, 2026, I have caused the following to be hand delivered including a thumb drive containing Exhibit A to the foregoing: Recording//file 240-455-765_2026-03-19\0007\0007.a00.

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