

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND



<u>Angela Elizabeth Hernandez de Perez,</u>)	
<u>Petitioner,</u>)	Civil Action No.: 1:26-CV-00594-BAH
)	
v.)	
)	
<u>Pamela Jo Bondi, et al.,</u>)	
<u>Respondents.</u>)	

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE**

INTRODUCTION

Petitioner, Ms. Hernandez de Perez, fled her home country of El Salvador seeking safety and stability in the United States. She entered the United States in October 2023 and was promptly arrested by CBP, pursuant to a warrant stating that her arrest occurred under 8 U.S.C. § 1226(a). *See* ECF No. 1-2. On October 28, 2023, DHS released Ms. Hernandez de Perez on her own recognizance, requiring her to attend regular check-ins with ICE in Baltimore, Maryland. *See* ECF No. 1-3, 1-4. Upon release, Ms. Hernandez de Perez relocated to Maryland, where she lives with her seventeen-year-old daughter. Since her release on recognizance, Ms. Hernandez de Perez complied with all ICE’s requirements related to her release: she timely filed for asylum, received employment authorization pursuant to that pending application, is currently employed at a nursing home in Montgomery County where she cares for the elderly, and, crucially, attended every scheduled ICE check-in, including the one that led to her underlying detention. **Today, March 3, 2026, at 1:00 PM, she is planning to appear at the ICE Office located in Baltimore, Maryland as she has been ordered to report to ICE.**

Ms. Hernandez de Perez is an active member of her community and church, as demonstrated by the letter from her pastor submitted with her request for bond. *See* Exh. D (bond

packet). She is the daughter of two Lawful Permanent Residents who rely on her for emotional support. Ms. Hernandez de Perez has no criminal history in the United States and is, in fact, 
 which caused her to seek safety in the United States. Ms. Hernandez de Perez lived at a fixed address and had a stable, supportive community for two years before she was detained and will return to the same address upon release. Petitioner is thus neither a flight risk nor a danger to the community.

In response to this Court's prior order, Federal Respondents scheduled Ms. Hernandez de Perez for a bond hearing before the Hyattsville Immigration Court on February 27, 2026. Ms. Hernandez de Perez submitted ample evidence in support of her request for bond to comply with her burden of establishing that she was not a danger to the community or a flight risk. *See* Ex. D (bond packet). The Immigration Judge concluded that Ms. Hernandez de Perez was not a danger to the community, but ultimately denied bond, finding that she is a flight risk such that no amount of bond could mitigate the risk—despite all the aforementioned factors in her favor. *See* Ex. E (Order of the Immigration Judge).

Ms. Hernandez de Perez is scheduled for a check-in with Immigration and Customs Enforcement (“ICE”) on Tuesday, March 3, 2026. She files this Emergency Motion to enjoin Federal Respondents from re-detaining her and to issue an order to show cause regarding the finding that Petitioner is a flight risk that ensures prompt resolution of this matter. In support of this Motion, Ms. Hernandez de Perez respectfully submits the following:

FACTUAL HISTORY

The facts surrounding the circumstances of Petitioner's initial detention were summarized in her Petition for Writ of Habeas Corpus (“Petition”). *See* ECF No. 1. This Court granted said Petition on February 13, 2026, and ordered a bond hearing pursuant to section 1226(a) to be held

within ten days of Petitioner's filing of a motion with the Immigration Court. *See* ECF No. 7. The Order specifically directed Federal Respondents to, *inter alia*: (1) immediately release Ms. Hernandez de Perez from custody; and (2) provide a bond hearing under § 1226(a) that "must comply in all respects with the regulations at 8 C.F.R. §§ 236.1(d), 1003.19, 1236.1(d) and any attendant process available pursuant to these provisions." *Id.*

The evidentiary filings in support of Ms. Hernandez de Perez's request for bond under § 1226(a) addressed all the critical factors that the Board of Immigration Appeals ("BIA") has established as the baseline of what Immigration Judges are to consider in assessing flight risk and danger to the community. *See, e.g., Matter of Guerra*, 24 I. & N. Dec. 37 (BIA 2006); *Matter of Dobrotvorskii*, 29 I. & N. Dec. 211, 213-14 (BIA 2025). Ms. Hernandez de Perez's bond motion included evidence of: (1) identity documents; (2) a current fixed address *via* Petitioner's sworn declaration; (3) immediate family ties to her Legal Permanent Resident parents, U.S. citizen sister, and immigrant daughter who is seeking a special immigrant juvenile visa due to the abuse the child suffered at the hands of her father; (4) proof of employment and Petitioner's valid employment authorization document; (5) proof of a pending application for asylum based on the physical, sexual, and psychological violence she suffered in El Salvador; (6) letters of support from her pastor and two U.S. citizen friends and community members; (7) proof of a valid, reliable, and credible U.S. citizen sponsor; and (8) proof of her ongoing compliance with all check-in requirements with ICE, as demonstrated by her initial arrest *during* her scheduled check-in. *See* Exh. D (bond packet).

Ms. Hernandez de Perez highlighted to the Immigration Judge her significant ties to the United States, her U.S. citizen sister and sponsor who has agreed to provide any necessary financial support and transportation to all hearings or check-ins with ICE, and her *prima facie* eligibility for

relief from removal via her application for asylum, withholding of removal, and protection under the Convention Against Torture.

The bond hearing took place on February 27, 2026, in front of the Hyattsville Immigration Court and Immigration Judge Thanos Kanellakos, for which Ms. Hernandez de Perez appeared *via* Webex with her attorney. The Immigration Judge denied Ms. Hernandez de Perez's bond, finding that she was not a danger to the community, but that she "is a flight risk, and no amount of bond will ensure her appearance at future hearings or her compliance with the directives of the Department." *See* Exh. E (Order of the Immigration Judge). Orally at the bond hearing, the Immigration Judge highlighted two main reasons for finding that no amount of bond could secure Ms. Hernandez de Perez's attendance at future hearings—despite numerous equities in her favor, her ongoing compliance with ICE check-ins, and her attendance at the post-habeas bond hearing following her release from custody. The Immigration Judge speculated that her asylum application will be weak due to a potential nexus issue while also speculating that the DHS's Motion to Pretermitt Ms. Hernandez de Perez's application for asylum—which was not submitted as evidence in the record for bond proceedings—would likely be granted and so Ms. Hernandez de Perez would have "no relief immediately available or in the future." In support of this conclusion, the Immigration Judge stated that there is recent precedent from the BIA—without naming the case—that says that where there is either no relief or speculative relief, no bond is the proper decision. As such, the Immigration Judge set no bond and found that Ms. Hernandez de Perez poses such a flight risk that no amount of bond could secure her attendance at future hearings.

LEGAL ARGUMENT

Ms. Hernandez de Perez's removal case is currently pending with the Hyattsville Immigration Court; she has potential relief from removal in the form of a timely-filed application

for asylum. Ms. Hernandez de Perez requests an Emergency Temporary Restraining Order pending this Court's adjudication of this Motion and the remaining requests for relief outlined in the original Petition, i.e. that this Court find that she does not pose a danger to the community or a flight risk and that she be free from detention until and unless there is a final order of removal entered in her removal proceedings. *See* ECF No. 1. Ms. Hernandez de Perez contends that the Federal Respondents failed to adhere to this Court's Order directing them to provide her with a bond hearing under § 1226(a) because of the manner in which the Immigration Judge conducted the hearing and the fact that he failed to adhere to the BIA's long-established precedents for bond hearings under § 1226(a). Most notably, the Immigration Judge's interpretation of Petitioner's evidence that she is *not* a flight risk does not comport with key BIA precedent as outlined in *Matter of Guerra*, 24 I. & N. Dec. 37 (BIA 2006), *Matter of R-A-V-P-*, 27 I. & N. Dec. 803 (BIA 2020), and *Matter of E-Y-F-G-*, 29 I. & N. Dec. 103 (BIA 2025). The Immigration Judge improperly weighed the negative factors in Ms. Hernandez de Perez's case while failing to mention any of the *Guerra* factors, especially those in her favor, while also considering factors outside the record of proceeding for the bond hearing, namely the DHS's Motion to Preterm her application for asylum. As such, Federal Respondents have not abided by the Court's Order that Respondents provide a bond hearing under § 1226(a) that "must comply in all respects with the regulations at 8 C.F.R. §§ 236.1(d), 1003.19, 1236.1(d) and any attendant process available pursuant to these provisions." *See* ECF No. 7.

I. MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTIVE RELIEF

To obtain a temporary restraining order, a petitioner-plaintiff "must establish that [s]he is likely to succeed on the merits, that [s]he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in [her] favor, and that an injunction is in the

public interest.” *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008); *Metro. Reg'l Info. Sys., Inc. v Am. Home Realty Network, Inc.*, 722 F.3d 591, 595 (4th Cir. 2013).

Ms. Hernandez de Perez is likely to succeed on the merits of her habeas petition given the Immigration Judge’s contravention of binding legal precedent for bond hearings under section 1226(a). The Immigration Judge’s adjudication of Ms. Hernandez de Perez’s request for bond contrary to established BIA precedent is a textbook violation of her Due Process rights.

A. Petitioner Is Likely to Succeed on the Merits of her Habeas Petition.

Ms. Hernandez de Perez is likely to succeed on the merits for several reasons. Her likelihood of success is evidenced by recent decisions regarding similar questions brought before district courts within this circuit and nationwide. *See Mendez Trigueros v. Noem*, No. 1:26-CV-205, Dkt. No. 13, Order (E.D. Va. Feb. 18, 2026) (Trenga, J.); *Lemus Crispin v. Bondi*, No. 1:26-CV-191, Dkt. No. 14, Order (E.D. Va. Feb. 12, 2026) (Brinkema, J.); *Byron Mejia Orozco v. Lyons*, No. 1:25-CV-01762, Dkt. No. 20, Order (E.D. Va. Dec. 1, 2025) (Trenga, J.); *Yin v. Maldonado*, No. 26-CV-0103 (PKC) (E.D.N.Y. Feb. 4, 2026) (Chen, J.); *Said v. Noem*, No. 3:25-CV-938-MOC, Dkt. No. 24 (W.D.N.C. Feb. 4, 2026) (Cogburn Jr., J.); *Picado v. Hyde*, No. 26-CV-065-JJM-PAS, Dkt. No. 7 (D.R.I. Feb. 9, 2026) (McConnell Jr., J.).

As to the specifics of Ms. Hernandez de Perez’s claim, first, the Immigration Judge did not apply binding case law setting forth the factors that an Immigration Judge must consider in assessing flight risk. *See Matter of Guerra*, 24 I. & N. Dec. 37 (BIA 2006) (listing (1) fixed U.S. address, (2) length of residence, (3) family ties, (4) employment history, (5) record of appearance, (6) criminal record/seriousness, (7) immigration history, (8) attempts to flee, and (9) manner of entry). The BIA has held that an Immigration Judge conducting a hearing under section 1226(a) should address *all* factors in context of the totality of the circumstances, even while allowing

discretion to consider many factors. *See Matter of Akhmedov*, 29 I. & N. Dec. 166 (BIA 2025) (holding that the Immigration Judge erred for failing to consider all relevant and probative evidence in their totality and finding that a lack of fixed address and a sponsor weighed heavily against the respondent); *see also Matter of R-A-V-P-*, 27 I. & N. Dec. 803, 806-07 (BIA 2020) (“The respondent’s limited avenue for relief, *combined with his other minimal ties to the United States*, support the Immigration Judge’s determination that the respondent poses a high flight risk and should be held without bond pending the outcome of his removal proceedings.”) (citing *Guerra*, 24 I&N Dec. at 40) (emphasis added).

However, here, the Immigration Judge wholly disregarded the baseline factors defined in *Guerra*, 24 I. & N. at 40 (BIA 2006), which articulates that while Immigration Judges are afforded broad discretion in bond proceedings regarding weighing of factors, but only “as long as the decision is reasonable.” Both BIA case law and due process require an adjudicator to consider all relevant and probative evidence when making a finding of fact. This requirement is even more important when the evidence relates to specific factors that have been held to be primarily relevant in a determination such as flight risk. *See id.*

The Immigration Judge denied bond while ignoring long-standing legal precedent set by the BIA. The Immigration Judge mentioned a recent precedential decision from the BIA that, per his understanding, instructs judges to deny bond where relief from removal is speculative or remote. The Immigration Judge did not specify which decision he was referencing in his oral or written decision. *See* Exh. E (Order of the Immigration Judge). The Immigration Judge did not reference any other case law or provide further analysis in his oral or written decisions. *Id.* Notably, all recent BIA decisions on bond reference the *Guerra* factors as an important step in the flight risk analysis that must be analyzed along with additional factors considering the totality of the

circumstances. *See Dobrotvorskii*, 29 I. & N. Dec. at 212; *E-Y-F-G-*, 29 I. & N. Dec. at 104; *R-A-V-P-*, 27 I. & N. Dec. at 805. The Immigration Judge improperly failed to analyze the *Guerra* factors or even mention them in his analysis, and instead impermissibly focused only on the supposed merits of Ms. Hernandez de Perez's asylum application and the DHS's alleged Motion to Pretermite, which was not filed as evidence in the bond hearing's record of proceedings. *See E-Y-F-G-*, 29 I. & N. Dec. at 105 ("Bond proceedings are separate and distinct from removal proceedings.") (citing 8 C.F.R. § 1003.19(d)).

In reality, Ms. Hernandez de Perez poses no risk of flight. First and foremost, she has complied with every requirement the government has imposed on her since her entry in 2023. She has attended every check-in, she timely filed for asylum, and, as noted by the Immigration Judge, she attended her bond hearing after this Court ordered her release from detention. Nothing in the record of proceedings or her history of interactions with the government suggests that she is a flight risk. When turning to the *Guerra* factors, the totality of the circumstances clearly shows that Ms. Hernandez de Perez is *not* a flight risk. Had the Immigration Judge correctly analyzed the *Guerra* factors; the record would have compelled him to find that a reasonable bond would alleviate any concerns he may have had regarding flight risk. First, Ms. Hernandez de Perez's sworn statement shows that she has a fixed address in Beltsville, Maryland where she lives with her minor daughter—and, as counsel highlighted during the hearing, she has dutifully updated the government to any change of address since entering. *See* Exh. D (bond packet). Second, Ms. Hernandez de Perez has lived and worked in the United States since her entry nearly two-and-a-half years ago. *Id.* Third, she has multiple family ties in the United States, including: her minor daughter, who is applying for Special Immigrant Juvenile Status based on the abuse she suffered at the hands of her father—and over whom Ms. Hernandez de Perez has exclusive custody due to

the father's abuse; her two Legal Permanent Resident parents; and her U.S. citizen sister. *Id.* Fourth, Ms. Hernandez de Perez is lawfully authorized to work in the United States and provided proof of employment from Salim, Inc. A+ Personal Home Care, where she works as a Personal Care Assistant in a nursing home. *Id.* Fifth, as previously mentioned, Ms. Hernandez de Perez has an exemplary record of compliance with every single condition of release the government has imposed on her. Sixth, she has no criminal record whatsoever, as conceded by the DHS during her bond hearing. Seventh, her immigration history includes timely applying for asylum; that application remains pending before the immigration court. Although the DHS stated that DHS filed a Motion to Preterm her asylum application and send her to Ecuador (and did not provide that motion as part of the bond proceedings), that motion remains pending before an Immigration Judge and Ms. Hernandez de Perez's asylum application is still yet to be fully adjudicated. Eighth, Ms. Hernandez de Perez has never attempted to flee authorities, nor has such conduct been alleged by the government. Finally, Ms. Hernandez de Perez admittedly entered the United States without inspection.

Notably, the only factors that the Immigration Judge analyzed and mentioned in his analysis were Ms. Hernandez de Perez's application for asylum and its speculative nature as well as the pending Motion to Preterm her asylum application. However, when considering the totality of the circumstances, the weight of the evidence clearly is in Ms. Hernandez de Perez's favor given her numerous equities and, most importantly, her history of compliance with government requirements. The negative aspects of her case, including her initial entry without permission and the pending Motion to Preterm, do not outweigh her positive factors. Additionally, Ms. Hernandez de Perez will have the right to appeal any grant of the Motion to Preterm, so the timing of any final order of removal is, in and of itself, speculative and thus should be treated as such

when weighing the evidence. Consequently, when following binding BIA precedent in weighing the *Guerra* factors, Ms. Hernandez de Perez is clearly not a flight risk and any risk she may pose can easily be mitigated by a cash bond. *Guerra*, 24 I. & N. at 40.

Ms. Hernandez de Perez's immigration counsel does not intend to file a Form EOIR-26, Notice of Appeal from a Decision of an Immigration Judge with the BIA regarding the bond decision. Any such appeal is futile as Ms. Hernandez de Perez would remain in detention during the pendency of such appeal and the bond appeal likely would not be resolved until after the merits of her underlying claim for relief is adjudicated by the Immigration Judge.

The decision by the Immigration Judge to deny bond based on flight risk by ignoring binding case law is a serious legal error that warrants this Court's review. The fact that the Immigration Judge *only* focused on a negative factor outside of the record of proceedings—while ignoring all of Ms. Hernandez de Perez's positive equities and evidence in the record—renders his decision a violation of due process. The Immigration Judge's decision was not supported by the law or evidence of record, and it was not a finding that any reasonable adjudicator would have made. As such, Ms. Hernandez de Perez is likely to succeed on the merits of her remaining claims within her original habeas petition.

B. Petitioner Will Suffer Irreparable Harm.

The harm that flows from the violation of Ms. Hernandez de Perez's constitutional rights is unquestionably irreparable. *See K.A. ex rel. Ayers v. Pocono Mountain Sch. Dist.*, 710 F.3d 99, 113 (3d Cir. 2013). The deprivation of a noncitizen's liberty is, in and of itself, irreparable harm. *See Opulent Life Church v. City of Holly Springs*, 697 F.3d 279, 295 (5th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). Irreparable harm is virtually presumed in cases like this where an individual is detained without due process. *Torres-Jurado v. Bideon*, No. 19 CIV. 3595 (AT),

2023 WL 7130898, at *4 (S.D.N.Y. Oct. 29, 2023) (“[B]efore the Government unilaterally takes away that which is sacred, it must provide a meaningful process.”). This Court has already found that the Federal Respondents violated Ms. Hernandez de Perez’s constitutional right to due process by re-detaining her without an explanation or the opportunity for a bond hearing. The further violation of Ms. Hernandez de Perez’s right to due process by the Federal Respondents by an insufficient bond hearing and decision adds to the significance of her potential loss of freedom.

C. Balance Of the Equities and Public Interest.

The Fourth Circuit has clearly found that “upholding constitutional rights surely serves the public interest.” *Centro Tepeyac v. Montgomery Cty.*, 722 F.3d 184, 191 (4th Cir. 2013) (quoting *Giovani Carandola, Ltd. V. Bason*, 303 F.3d 507, 521 (4th Cir. 2002)). As discussed herein, the denial of a proper bond hearing under section 1226(a) as ordered by this Honorable Court and the potential unlawful re-detention without bond of Ms. Hernandez de Perez will likely violate federal law and her constitutional right to due process. “There is generally no public interest in the perpetuation of unlawful agency action,” and “there is a substantial public interest in having governmental agencies abide by the federal laws that govern their existence and operations.” *League of Women Voters of U.S. v. Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016) (cleaned up).

Here, the re-detention of Ms. Hernandez de Perez by the Federal Respondents without bond—despite the judge’s finding that she is not a danger and a clear record that she poses no flight risk—is in violation of her Fifth Amendment rights and far outweighs any burden Federal Respondents would suffer.

II. THIS COURT HAS THE AUTHORITY TO GRANT PETITIONER’S REQUEST TO NOT BE RE-DETAINED BY FEDERAL RESPONDENTS

As a general matter, writs of habeas corpus are used to request release from custody. *Wilkinson v. Dotson*, 544 U.S. 74, 78 (2005). A habeas court has “the power to order the conditional

release of an individual unlawfully detained[,] [b]ut more may be required depending on the circumstances.” *Boumediene v. Bush*, 553 U.S. 723, 729 (2008) (noting “common-law habeas corpus was, above all, an adaptable remedy”).

While this Court may not have jurisdiction to review the discretionary judgment of the Immigration Judge’s bond determination, *see* 8 U.S.C. § 1226(e), the Court *does* have the authority to review whether the Immigration Judge applied the factors set forth in binding case law, and whether the Immigration Judge conducted the bond determination in a manner that comports with due process. Section 1226(e) does not strip a district court of its traditional habeas jurisdiction, bar constitutional challenges, or preclude claims that the discretionary process itself was constitutionally flawed. *Miranda v. Garland*, 34 F.4th 338, 352-54 (4th Cir. 2022); *see also Mejia Orozco v. Lyons*, No. 1:25-CV-01762, Dkt. No. 20, slip op. at 4 (E.D. Va. Dec. 1, 2025) (Trenga, J.) (“the Court has jurisdiction to review whether the Immigration Judge’s denial of bond to the Petitioner because he is a flight risk . . . complies with constitutional Due Process requirements”); “[C]laims that the discretionary process itself was constitutionally flawed are cognizable in federal court on habeas because they fit comfortably within the scope of § 2241.” *Singh v. Holder*, 638 F.3d 1196, 1202 (9th Cir. 2011) (internal citation omitted), *abrogated on other grounds by Rodriguez Diaz v. Garland*, 53 F.4th 1189 (9th Cir. 2022); *see also Demore v. Kim*, 538 U.S. 510, 511 (2003). Here, Ms. Hernandez de Perez challenges whether the Immigration Judge provided her with a constitutionally adequate bond hearing, a question that falls squarely within the jurisdiction of this Court.

This Court granted Ms. Hernandez de Perez a conditional release to remedy the initial violation of her right to due process by having the Federal Respondents provide her with a bond hearing pursuant to § 1226(a). *See* ECF No. 7. As such, Federal Respondents were under obligation

to ensure that the bond hearing conducted by the Immigration Judge at the Hyattsville Immigration Court comported with all the statutory and related case law under section 1226(a).

The Immigration Judge at issue failed to comply with his legal duty to follow well-established BIA precedent requiring him to make a determination based on the totality of the circumstances. Herein, Petitioner also submits a sworn declaration of recently retired Immigration Judge Lawrence O. Burman, who served as an Immigration Judge (both on the detained and non-detained dockets) for over 27 years from April 1998 to December 2025. *See* Exh. F (affidavit from Former Immigration Judge Burman). Immigration Judge Burman explains how, historically, “concerns about flight risk were usually addressed by setting an appropriate bond amount” and “[i]t was rare for a bond to be denied solely based on flight risk.”¹ *Id.* at ¶ 11.

The fact that the Immigration Judge denied bond on flight risk, despite overwhelming evidence proving that Ms. Hernandez de Perez poses no risk of flight, is therefore an issue that this Court has the authority to address.

CONCLUSION

For the foregoing reasons, the Court should grant the instant Emergency Motion for a Temporary Restraining Order to enjoin the Federal Respondents from taking Ms. Hernandez de Perez back into their custody. In addition, this Court should enter a preliminary injunction prohibiting Respondents from taking Ms. Hernandez de Perez into custody until and unless Respondents provide her with an individualized constitutionally compliant bond hearing.

Ms. Hernandez de Perez also herein requests this Court to rule on the remaining requests for relief in her original Petition, including: allowing Petitioner’s continued release subject to the

¹ *See also* Josh Gerstein, *Federal Judges Move to Block ICE from Expanding Detention Without Bond*, Politico (Feb. 10, 2026, 4:54 PM), <https://www.politico.com/news/2026/02/10/ice-immigration-detention-court-orders-00771727> (outlining various times that federal judges found post-habeas bond hearings to be constitutionally deficient);

same Order of Release on Recognizance issued in 2023; in the alternative, conduct a custody hearing before this Court; in the alternative, order that Respondents provide Petitioner with a 1226(a) bond hearing with the additional safeguards outlined in the original Petitioner; and any other and further relief that this Court deems just and proper. Should the Court deem it proper, Petitioner respectfully requests that the Court issue an order to show cause and require the Respondents' return within three days or less of the order to show cause.

Respectfully submitted this: March 3, 2026

/s/ Jennifer Molina
Molina Immigration Legal Services
7100 Guilford Drive, Ste 2039
Frederick, MD 21704
Phone: 410-941-9049
jmolina@wearemils.com
District of Maryland Bar ID: 30895
Attorney for Petitioner

Certificate of Service

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

/s/ Jennifer Molina
Molina Immigration Legal Services
7100 Guilford Drive, Ste 2039
Frederick, MD 21704
Phone: 410-941-9049
jmolina@wearemils.com
District of Maryland Bar ID: 30895
Attorney for Petitioner