

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NAILETH MARCANO-PARRA,	*	
	*	
Petitioner,	*	
	*	No. 1:26-cv-00596-PX
v.	*	
	*	
VERNON LIGGINS, <i>et al.</i> ,	*	
	*	
Respondents	*	

PETITIONER'S STATUS UPDATE

Petitioner and Respondents (“the Parties”), by and through their respective undersigned counsel, and pursuant to this Court’s Order dated February 18, 2026 (ECF No. 10), provide a Joint Status Report and state as follows:

1. Petitioner is in custody at the Denver Contract Detention Facility in Aurora, Colorado. *See* Exhibit A (ICE Detainee Locator).
2. Petitioner’s counsel has been working with Petitioner’s family to obtain the documentary evidence needed to support a custody redetermination request before the immigration court. *See, e.g., Matter of Guerra*, 24 I&N Dec. 37, 40-41 (BIA 2006) (outlining factors relevant to custody redetermination and explaining that immigration judges may consider “[a]ny evidence in the record that is probative and specific” in redetermining custody); *Matter of R-A-V-P-*, 27 I&N Dec. 803, 805 (BIA 2020) (explaining that immigration judges may consider the viability of relief applications in redetermining custody); *Matter of Dobrotvorskii*, 29 I&N Dec. 211, 211 (BIA 2025) (explaining that immigration judges may consider “the existence of a valid, reliable, and credible [bond] sponsor” in redetermining custody).

3. While Petitioner's counsel has received some of the necessary evidence, the family has yet to obtain crucial evidence including a bond sponsor packet (which requires a letter from the bond sponsor, the sponsor's proof of lawful immigration status, and the sponsor's most recent tax return), a copy of Petitioner's previously-filed applications for relief and protection,¹ and Petitioner's son's birth certificate. *See Matter of Dobrotvorskii*, 29 I&N Dec. at 211 (considering relevant the existence of a bond sponsor); *Matter of R-A-V-P-*, 27 I&N Dec. at 805 (considering relevant the viability of applications for relief and protection); *Matter of Guerra*, 24 I&N Dec. at 40 (considering relevant family ties in the United States).
4. Absent this evidence, it is a near certainty that Petitioner will be denied bond; even where such evidence is before the immigration court, immigration judges have been denying bond for flight risk, seemingly as a matter of course. *See, e.g.*, ECF No. 1-4.
5. Because Petitioner's counsel has yet to receive this critical evidence and it is Petitioner's burden to establish bond eligibility, no custody redetermination request for Petitioner has been filed before the immigration court. *See Matter of Guerra*, 24 I&N Dec. at 40 ("The burden is on the alien to show to the satisfaction of the Immigration Judge that he or she merits release on bond.").
6. As soon as Petitioner's counsel receives the required evidence, she will file Petitioner's custody redetermination request before the immigration court.

WHEREFORE, the Parties request that the Court ACCEPT this Joint Status Report and agree to file another Status Report in fourteen days.

¹ As custody proceedings are "separate and apart from" removal proceedings, filings in Petitioner's removal case—including her applications for relief and protection—are not available to counsel through the immigration court's online filing system, ECAS. *See* 8 C.F.R. § 1003.19(d).

Respectfully submitted,

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Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March of 2026, a copy of the foregoing Status Report was served via CM/ECF on all parties and counsel receiving electronic notice in this case.

/s/ Rachael E. Savage
Rachael E. Savage, Esq.
Counsel for Petitioner