

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NELVIN MANOLO GARCIA CAMEY,

Petitioner,

v.

KRISTI NOEM, et al.,

Respondents.

Civil Action No. 8:26-cv-00621-SAG

JOINT STATUS REPORT

Petitioner, and Respondents, by and through their respective undersigned counsel, submit this Joint Notice and state:

1. On March 3, 2026, Petitioner filed a Bond Redetermination Request.
2. On March 12, 2026, Petitioner had a bond hearing where he was denied bond as a flight risk due to alleged insufficient evidence of stable employment, housing, and no application for relief filed. *See Exhibit #1.*
3. Petitioner's position is that no meaningful bond hearing was provided, and that there was no meaningful or reasonable consideration of Petitioner's positive equities, in violation of due process. Further, Petitioner respectfully submits that the Immigration Judge ("IJ") misconstrued certain material facts in the record. Specifically, the IJ stated that no application for relief from removal had been filed. However, Petitioner had in fact submitted an application for cancellation of removal to the Immigration Court during the bond proceedings. (A copy of Petitioner's bond redetermination request, along with supporting documentation, is attached hereto as Exhibit 2). Petitioner has resided in the United States since 2015 and is the parent of a minor United States citizen child. Due to the need to expeditiously submit the bond redetermination

request, and given Petitioner's detention, Petitioner did not have sufficient time to obtain and submit all supporting documentation at that stage of the proceedings. Nonetheless, additional documentation supporting Petitioner's eligibility for relief, specifically cancellation of removal, can and will be submitted during the removal proceedings. Petitioner further submits that this case should not be closed. In light of Petitioner's significant ties to the United States, including his long residence and family connections, Petitioner should not be deemed a flight risk. Accordingly, Petitioner respectfully requests that the Court order his immediate release. In the alternative, if the Court determines that bond is appropriate, Petitioner requests that bond be set in a reasonable amount between \$2,000 and \$3,000, or that Petitioner be released under reasonable conditions of supervision.

4. Respondent's position is that the case may be closed because the Immigration Judge held a bond hearing for Petitioner pursuant to the Court's Order, at which Petitioner was represented by counsel and was able to present evidence. The bond hearing was conducted consistent with the authorities identified in the Court's Order. Moreover, to the extent Petitioner will challenge the Immigration Judge's bond hearing determination by way of a motion to enforce, motion for order to show cause, or the like, 8 U.S.C. § 1226(e) divests this Court of jurisdiction to review "or set aside any action by the Attorney General . . . regarding the detention of any alien or the revocation or denial of bond or parole." 8 U.S.C. § 1226(e). Indeed, this Court has already found that 8 U.S.C. § 1226(e) precludes its review of an Immigration Judge's bond decision in another recent immigration habeas case. *See Chavez de Vasquez v. Noem*, Civil Action No. SAG-25-03657, 2025 WL 3713773 (D. Md. Dec. 23, 2025). Other members of this Court have recently reached the same conclusion in other similar immigration habeas cases. *See, e.g., Pinto-Nunez v. Bondi*, Civil Action No. MJM-26-397, 2026 WL 672770 (D. Md. Mar. 10, 2026); *Santos Garcia*

v. Baker, No. 26-cv-00616-GLR, ECF No. 17 (D. Md. Mar. 9, 2026); *Flores Hernandez v. Noem*, Case No. 26-cv-00423-JRR, ECF No. 17 (D. Md. Feb. 24, 2026); *Mejia Acosta v. Noem*, Case No. 26-cv-00086-MJM, ECF No. 16 (D. Md. Feb. 20, 2026); *Maya Torres v. Baker*, Case No. 25-cv-03961-MJM, ECF No. 32 (D. Md. Jan. 20, 2026).

5. The Parties propose the following briefing schedule:

- a. Petitioner will file a brief in support of their position by Monday, March 16, 2026.
- b. Respondents will file their response by March 23, 2026.

Dated: March 12, 2026

Respectfully submitted,

Kelly O. Hayes
United States Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 12, 2026, a copy of the foregoing Joint Status Report was served electronically on all parties and counsel receiving service via CM/ECF in this case.

/s/ Ronald D. Richey

Ronald D. Richey
Counsel for Petitioner