DETAINED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

In the matter of: **MADU UCHECHUKWU** **Petitioner,** **v.** **JEREMY CASEY, et al.,** **Respondents.**	**Case Number: 3:26-cv-01978-RSH-MSB** **A** [redacted] **MOTION TO ENFORCE JUDGMENT** **Challenge to Unlawful Incarceration; Request for Declaratory and Injunctive Relief**

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INTRODUCTION

Petitioner Madu Uchechukwu ("Petitioner") respectfully moves under 28 U.S.C. §§ 2241 and 1651(a) to enforce this Court's April 3, 2026, judgment. The Court ordered a bond hearing within seven days at which the Government bore the burden of establishing, by clear and convincing evidence, that Petitioner posed a danger to the community or a risk of flight. Although a hearing occurred on April 10, 2026, Petitioner alleges that it did not provide the meaningful, individualized process required by the judgment. Petitioner first learned of the ordered hearing on April 8, received the written order on April 9, lacked documents from his hospitalized sponsor, and requested additional preparation time. The Immigration Judge denied that request and continued detention based substantially on the prior denial of asylum and withholding of removal and Petitioner's inability, while unprepared, to recall the basis for denial of other relief. The Government presented no affirmative danger evidence and stated that it was premature to argue flight risk. Because the resulting findings of both danger and flight risk were made without the preparation opportunity and affirmative individualized proof required by the judgment, Petitioner seeks enforcement of the Court's order.

1. On April 3, 2026, this Court granted habeas relief and ordered Respondents to arrange a bond hearing for Petitioner **within seven days**, with the Government bearing the burden of proving danger to the community or risk of flight by clear and convincing evidence. **A true and correct copy of the Court's Order is attached as Exhibit "A."**
2. On April 8, 2026, five days after entry of the order, Petitioner was unexpectedly called to immigration court and advised by Immigration Judge Stuart Zander that his habeas petition had been granted and that he would receive a bond hearing. The hearing could not proceed because an Igbo interpreter was unavailable.
3. Petitioner contacted his proposed sponsor after returning to his unit, but she was ill and hospitalized. Petitioner received the federal habeas order by mail on April 9, 2026.
4. On April 10, 2026, Petitioner was returned to court for the bond hearing. He explained that he had learned of the order only two days earlier, lacked his sponsor's documents, and was not prepared. He requested a continuance, which the Immigration Judge denied.

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5. The Government did not present affirmative evidence that Petitioner posed a danger to the community and stated that it would be premature to argue flight risk at that time. Nevertheless, the Immigration Judge denied release and found Petitioner both a flight risk and a danger to the community. **A true and correct copy of the Immigration Judge's order is attached as Exhibit "B."**

6. The adverse findings rested substantially on the denial of Petitioner's asylum and withholding claims under the material-support bar, arising from his participation in an IPOB protest, and on his inability during the unprepared hearing to recall the basis for denial of other relief, not on evidence of criminal conduct, violence, nonappearance, escape, or violation of any court order.

7. Petitioner has no criminal convictions in the United States or elsewhere. He states that his participation consisted of printing flags and encouraging attendance at a peaceful protest, that he did not participate in violence, and that DHS possesses his fingerprints for background checks.

8. Petitioner did not appeal the bond decision to the Board of Immigration Appeals. Exhaustion should be excused because this Motion asks the Court to enforce its own judgment; the April 10 proceeding denied the basic process ordered by the Court; and continued administrative delay would prolong a serious deprivation of liberty after nearly twenty-two months in detention.

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STATEMENT OF FACTS

9. Petitioner Madu Uchechukwu is a native and citizen of Nigeria. He entered the United States near the southern border on or about December 18, 2024, seeking asylum, and has remained in immigration custody.

10. On January 22, 2025, Petitioner received a credible-fear interview and was found to have demonstrated a credible fear of return to Nigeria. DHS thereafter placed him in removal proceedings.

11. Petitioner applied for asylum and withholding of removal. On March 5, 2026, the Immigration Judge denied those forms of relief after concluding that the material-support bar applied based on Petitioner's [redacted].

12. Petitioner states that his activity was peaceful: he printed flags and encouraged others to attend a protest. He denies participating in or knowing about violent conduct attributed to other members of the group.

13. On March 27, 2026, Petitioner filed a pro se petition for writ of habeas corpus under 28 U.S.C. § 2241 in this Court, Case No. 3:26-cv-01978-RSH-MSB, challenging his prolonged detention without a bond hearing. On April 3, 2026, this Court granted the petition and directed Respondents to arrange a bond hearing within seven days at which the Government would bear the burden of establishing danger or flight risk by clear and convincing evidence. **A true and correct copy of the Court's Order is attached as Exhibit "A."**

14. On April 8, 2026, Immigration Judge Stuart Zander informed Petitioner that the habeas petition had been granted and that a bond hearing would be held. The matter was continued because an Igbo interpreter was unavailable.

15. Petitioner immediately attempted to contact his proposed sponsor, but she was ill and hospitalized. Petitioner received the federal order by mail on April 9, 2026.

16. On April 10, 2026, Petitioner appeared for the bond hearing and requested a continuance because he had only recently learned of the order and had not had sufficient time to obtain sponsor documents or prepare. The Immigration Judge denied the request.

17. Petitioner answered questions concerning his sponsor, including where she lived, when they last spoke, and how they knew one another. The Government offered no affirmative evidence of danger and stated that it was premature to argue flight risk at that time.

18. The Immigration Judge questioned Petitioner about the denial of asylum and withholding and about other relief. Petitioner explained the material-support finding but, while unprepared and without adequate time to assemble the record, could not recall the basis for denial of other relief. The Immigration Judge then denied release, finding both flight risk and danger to the community.

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19. The record contains no identified criminal conviction, prior failure to appear, escape, evasion, violation of a court order, or other conduct showing unwillingness to comply. Petitioner represents that he has never committed or been convicted of a crime in any country.

20. Petitioner did not appeal the bond decision to the Board of Immigration Appeals. He has remained detained for nearly twenty-two months and reports serious deterioration from prolonged confinement.

21. Although a hearing occurred, it did not comport with the basic process required by the Court's April 3 judgment because Petitioner was denied a reasonable opportunity to prepare, the Government did not carry its heightened burden with affirmative evidence, and the ruling relied on speculative merits considerations rather than present, individualized proof of danger or flight risk.

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LEGAL STANDARD FOR ENFORCEMENT OF THE COURT'S JUDGMENT

22. A federal court retains authority to enforce the judgment entered in a habeas action. Section 2241 permits review of whether federal custody violates the Constitution or laws of the United States, and the All Writs Act authorizes orders necessary or appropriate in aid of the Court's jurisdiction. 28 U.S.C. §§ 2241, 1651(a). Courts possess inherent authority to enforce compliance with their lawful orders. *Shillitani v. United States*, 384 U.S. 364, 370 (1966); *Spallone v. United States*, 493 U.S. 265, 276 (1990). The Ninth Circuit likewise recognizes district-court authority to enforce immigration-related judgments and agreements according to their terms. *Flores v. Sessions*, 862 F.3d 863, 869–75 (9th Cir. 2017). A hearing conducted after entry of judgment satisfies that judgment only if it supplies the procedures the Court ordered.

23. Federal habeas review extends to constitutional claims and legal error in immigration bond proceedings. *Singh v. Holder*, 638 F.3d 1196, 1200–03 (9th Cir. 2011). Where substantial liberty interests are at stake, *Singh* requires the Government to justify continued detention by clear and convincing evidence. *Id.* at 1203–05; see also *Casas-Castrillon v. Dep't of*

Homeland Sec., 535 F.3d 942, 950–52 (9th Cir. 2008) (requiring adequate procedural safeguards and a hearing addressing danger and flight risk in prolonged immigration detention); *Diouf v. Napolitano*, 634 F.3d 1081, 1091–92 (9th Cir. 2011) (recognizing that prolonged detention requires a bond hearing at which the Government must establish danger or flight risk).

24. The custody determination must be individualized and must address whether detention is necessary in light of available release conditions. *Hernandez v. Sessions*, 872 F.3d 976, 990–94 (9th Cir. 2017), confirms that constitutionally adequate bond procedures require consideration of financial ability and alternative conditions of release. See also *Bell v. Wolfish*, 441 U.S. 520, 535–39 (1979) (civil detention may not amount to punishment); *United States v. Salerno*, 481 U.S. 739, 748–52 (1987) (upholding preventive detention only with rigorous procedural safeguards and an individualized finding). Thus, the Government's burden cannot be satisfied merely by identifying a generalized concern about appearance; the adjudicator must evaluate whether reasonable conditions can mitigate the asserted risk.

25. This Motion does not ask the Court to reweigh discretionary bond factors. It asks whether Respondents complied with the April 3, 2026, judgment by applying the ordered burden of proof and providing the individualized process that judgment required. That is a legal and constitutional enforcement question within the Court's habeas jurisdiction. *Singh*, 638 F.3d at 1200–02; *Hernandez*, 872 F.3d at 988.

JURISDICTION EXISTS AND EXHAUSTION IS NOT REQUIRED

26. This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner remains in federal custody and alleges that Respondents failed to provide the constitutionally adequate bond process required by the Court's judgment. Habeas is the proper vehicle for constitutional and legal challenges to immigration detention. *Demore v. Kim*, 538 U.S. 510, 516–17 (2003); *Zadvydas v. Davis*, 533 U.S. 678, 687–88 (2001); *Singh*, 638 F.3d at 1200–02; *Prieto-Romero v. Clark*, 534 F.3d 1053, 1058–59 (9th Cir. 2008).

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27. Petitioner's claim does not seek review of the merits of his removal order or ordinary reconsideration of a discretionary custody decision. It seeks enforcement of a federal judgment and review of whether the ordered burden and procedures were actually applied. Neither 8 U.S.C. § 1226(e) nor the pendency of an administrative appeal forecloses review of that legal and constitutional question. *Jennings v. Rodriguez*, 583 U.S. 281, 312 (2018) (distinguishing statutory construction from unresolved constitutional claims); *Hernandez*, 872 F.3d at 988; *Singh*, 638 F.3d at 1200–02.

Exhaustion is not Required for Constitutional Challenges

28. Exhaustion under § 2241 is prudential rather than jurisdictional. *Laing v. Ashcroft*, 370 F.3d 994, 997–1001 (9th Cir. 2004). Courts consider whether agency expertise is needed to develop the record, whether waiver would encourage deliberate bypass of the administrative process, and whether agency review is likely to correct the asserted error. *Puga v. Chertoff*, 488 F.3d 812, 815 (9th Cir. 2007). Exhaustion may be excused where administrative remedies are inadequate, pursuit would be futile, or delay would cause irreparable injury. *McCarthy v. Madigan*, 503 U.S. 140, 146–49 (1992), superseded by statute on other grounds as recognized in *Porter v. Nussle*, 534 U.S. 516, 524 (2002).

29. Those exceptions apply here. Petitioner did not appeal the April 10 bond determination to the Board, but this Motion presents a distinct enforcement question: whether Respondents complied with this Court's April 3, 2026, judgment. Agency review cannot displace this Court's authority to interpret and enforce its own judgment, and requiring Petitioner to begin and complete administrative review after the constitutionally deficient hearing would prolong the asserted deprivation of liberty.

30. Further delay would risk rendering the judgment ineffective. Petitioner had only two days' notice of the ordered bond hearing, was denied a continuance despite lacking sponsor documents, and has now experienced nearly twenty-two months of detention. Under these circumstances, exhaustion is inapplicable to the enforcement claim or should be excused

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under *Laing* because the remedy would be inadequate and delay would cause irreparable injury.

Courts in This District Routinely Exercise Jurisdiction Without Requiring Exhaustion

28. Courts in this District, including this Court, regularly exercise habeas jurisdiction over immigration detention claims without requiring exhaustion, particularly where constitutional violations are alleged.

29. Most importantly, in *Khan v. Noem*, No. 3:26-cv-01274-JO-MMP, the United States District Court for the Southern District of California granted a motion to enforce judgment based on an inadequate bond hearing.

30. Similarly, in *Rumiantseva v. LaRose*, No. 26-cv-2214-JO-DEB, the United States District Court for the Southern District of California granted a motion to enforce judgment based on an inadequate bond hearing.

31. Likewise, in *Hagos v. Warden Jeremy Casey*, No. 3:26-cv-02365-JO-SBC, the United States District Court for the Southern District of California granted a motion to enforce judgment based on an inadequate bond hearing.

32. Recent decisions in this District have exercised habeas jurisdiction to enforce judgments requiring constitutionally adequate immigration bond hearings. In *Khan v. Noem*, *Rumiantseva v. LaRose*, and *Hagos v. Warden Jeremy Casey*, the court granted enforcement relief based on alleged deficiencies in post-judgment bond proceedings. Those decisions support the narrower proposition that a district court may examine whether the hearing provided complied with the procedures required by its judgment without treating the motion as an appeal from discretionary bond weighing.

CLAIMS FOR RELIEF

GROUND ONE

VIOLATION OF FIFTH AMENDMENT RIGHT TO DUE PROCESS- FAILURE TO PROVIDE CONSTITUTIONALLY ADEQUATE PROCEDURAL SAFEGUARDS

33. Petitioner realleges and incorporates the preceding paragraphs.

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34. The Fifth Amendment protects Petitioner's liberty interest against prolonged civil detention without constitutionally adequate procedures. *Zadvydas v. Davis*, 533 U.S. 678, 690, 693 (2001). Freedom from physical restraint lies at the core of protected liberty. *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

35. Due process required more than a hearing in form. Under this Court's judgment, the Government had to prove by clear and convincing evidence that continued detention was necessary because Petitioner posed a danger to the community or a risk of flight.

36. Petitioner was denied a meaningful opportunity to prepare through a sequence of procedural failures outside his control. The federal judgment gave Respondents seven days to arrange a constitutionally adequate bond hearing. Petitioner was not brought to immigration court or notified of the ordered hearing until April 8, the fifth day after entry of the order. Even then, the proceeding could not go forward because an Igbo interpreter was unavailable. Petitioner received the written federal order only on April 9 and was returned to court on April 10, the final day for compliance. The Immigration Judge then denied his request for a continuance, leaving him only two days from oral notice, and one day from receipt of the written order, to prepare. His proposed sponsor was ill and hospitalized, and he had no fair opportunity to obtain her documents or assemble evidence responsive to the bond factors. Whatever the reason for the timing, the combined effect of late notice, interpreter unavailability, and denial of a continuance deprived Petitioner of a reasonable opportunity to prepare and be heard.

37. The Government did not meet its heightened burden. It presented no affirmative evidence that Petitioner posed a danger to the community and stated that it was premature to argue flight risk at that time. The record identified no criminal conviction, prior nonappearance, escape, or violation of a court order demonstrating dangerousness or likely absconding.

38. Despite that evidentiary deficiency, the Immigration Judge found both danger and flight risk after questioning Petitioner about the prior denial of asylum and withholding and his inability, while unprepared, to recall the basis for denial of other relief. A removal-case

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merits determination does not itself establish present dangerousness or flight risk by clear and convincing evidence.

39. The material-support issue likewise could not substitute for individualized danger evidence. Petitioner stated that his own activity consisted of printing flags and encouraging attendance at a peaceful IPOB protest, that he did not participate in violence, and that he had no knowledge of violent conduct attributed to others. The Government introduced no evidence that Petitioner personally committed, threatened, directed, or knowingly supported violence. The prejudice was concrete and affected the evidence before the Immigration Judge. Petitioner did not learn of the ordered hearing until April 8, the fifth day after entry of the seven-day order, and that proceeding could not go forward because an Igbo interpreter was unavailable. He received the written order on April 9. When he returned on April 10, the Immigration Judge denied additional preparation time even though Petitioner's proposed sponsor was hospitalized and Petitioner lacked her documents. Petitioner therefore had no meaningful opportunity to obtain and present the available sponsor evidence bearing on his proposed release. He nevertheless answered the questions he could, including where his sponsor lived, when they last spoke, and how they knew one another. The missing documents and undeveloped sponsor record were directly connected to the compressed preparation period, not to a refusal to cooperate. That deprivation mattered because the Government presented no affirmative danger evidence, stated that it was premature to argue flight risk, and the Immigration Judge nevertheless found both danger and flight risk based substantially on the prior merits denial and Petitioner's inability, while unprepared, to recall the basis for denial of other relief. A reasonable opportunity to secure sponsor evidence and organize the underlying record could have materially affected the individualized assessment required by the Court's order. On these facts, the procedural deficiency was prejudicial because it deprived Petitioner of evidence responsive to the risks used to justify his continued detention.

40. A constitutionally adequate determination required consideration of whether reporting requirements, address verification, sponsor supervision, electronic monitoring, transportation

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assistance, or an affordable bond could mitigate any identified risk. *Hernandez v. Sessions*, 872 F.3d 976, 990–94 (9th Cir. 2017).

41. Petitioner's entry near the southern border to seek protection does not establish future nonappearance. Congress expressly permits a person who is physically present in or arrives in the United States, whether or not at a designated port of arrival, to apply for asylum. INA § 208(a)(1), 8 U.S.C. § 1158(a)(1). Petitioner received a positive credible-fear determination, applied for asylum and withholding, and pursued habeas relief from prolonged detention. Those facts do not establish by clear and convincing evidence that he would fail to appear, particularly where the record identifies no prior nonappearance, escape, or violation of a court order.

42. The IJ's reliance on the prior denial of Petitioner's merits case was particularly speculative and legally improper. In *Bore v. Casey*, Case No. 26-cv-2286-JES-GC, Judge James E. Simmons Jr. granted a motion to enforce judgment after concluding that a bond hearing did not comply with a prior habeas order where the IJ relied on the noncitizen's pending merits posture, detention-created lack of U.S. ties, and generalized assumptions rather than specific and individualized evidence of flight risk. The court emphasized that a federal court retains authority to enforce its own habeas judgment, that exhaustion is prudential rather than jurisdictional in this context, and that exhaustion may be excused where further administrative delay would be inadequate or futile in remedying the ongoing constitutional harm. The court further held that the Government's burden and the individualized-hearing requirement are not satisfied by pro forma recognition of the correct standard followed by reasoning that relies on speculation or categorical assumptions. **A true and correct copy of the order in *Bore v. Casey* is attached as Exhibit "C."**

43. *Bore* is directly persuasive because the relevant defects recur here. As in *Bore*, the bond ruling relied on considerations drawn from the merits posture and generalized assumptions rather than affirmative, individualized evidence establishing flight risk or danger. Here, Petitioner had remained detained since entering the United States to seek protection; his asylum and withholding claims had been denied under the material-support bar based on his

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participation in an IPOB protest; and the IJ relied substantially on that merits denial and Petitioner's inability, at an unprepared hearing, to recall details concerning other relief. Yet the Government presented no affirmative danger evidence and stated that it was premature to argue flight risk. The comparison therefore concerns the same core error identified in *Bore*: substituting speculative inferences from the protection case for present evidence satisfying the Government's clear-and-convincing burden.

44. *Bore* also supports enforcement because the defects here were compounded by the denial of a meaningful opportunity to prepare. Petitioner first learned on April 8, 2026, that habeas relief had been granted, received the written order on April 9, and was required to proceed on April 10. His proposed sponsor was ill and hospitalized, he lacked her supporting documents, and the IJ denied his request for a continuance. Petitioner nevertheless answered questions concerning the sponsor, including where she lived, when they last spoke, and how they knew one another. The absence of documents that Petitioner had only two days to obtain from a hospitalized sponsor could not substitute for the Government's affirmative proof. Under *Bore*, a hearing does not become individualized merely because the adjudicator invokes the correct burden; the ruling must actually evaluate the available evidence and any reasonable conditions of release rather than rely on detention-created gaps, categorical assumptions, or speculation.

45. Because the hearing denied Petitioner a reasonable opportunity to prepare and the resulting findings were made without affirmative, individualized evidence satisfying the Government's clear-and-convincing burden, the proceeding did not supply the process required by the Court's judgment. Petitioner's continued detention under that ruling therefore warrants enforcement relief.

GROUND TWO

FAILURE TO COMPLY WITH FEDERAL COURT ORDER

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46. Petitioner realleges and incorporates the preceding paragraphs. Ground Two seeks enforcement of this Court's April 3, 2026, judgment, not appellate review of discretionary bond weighing.

47. The judgment required a bond hearing within seven days at which the Government bore the burden of proving danger or flight risk by clear and convincing evidence. Compliance required more than placing Petitioner before an Immigration Judge; Respondents had to furnish the substantive procedures ordered by the Court.

48. Petitioner was not brought to immigration court or notified of the ordered hearing until April 8, the fifth day after entry of the seven-day order. The proceeding could not go forward because an Igbo interpreter was unavailable. After Petitioner received the written order on April 9, the Immigration Judge denied his April 10 request for a continuance even though his proposed sponsor was hospitalized and he lacked her documents. These circumstances support Petitioner's claim that the hearing, although timely under the literal seven-day deadline, did not provide a meaningful opportunity to prepare and present evidence.

49. The resulting findings of danger and flight risk did not implement the evidentiary framework required by the judgment. The Government presented no affirmative danger evidence and stated that it was premature to argue flight risk. The Immigration Judge nevertheless relied substantially on the prior merits denial and Petitioner's inability, while unprepared, to recall the basis for denial of other relief. Ground Two therefore does not ask the Court to reweigh ordinary bond factors; it asks the Court to determine whether a ruling reached without affirmative Government proof and without a meaningful opportunity to present available sponsor evidence complied with the procedures the Court expressly ordered.

50. Petitioner's failure to appeal the bond ruling does not prevent enforcement. Section 2241 exhaustion is prudential, not jurisdictional, and may be excused where remedies are inadequate, pursuit would be futile, or delay would cause irreparable injury. *Laing v. Ashcroft*, 370 F.3d 994, 997–1001 (9th Cir. 2004). The Court retains authority to decide whether its own judgment was obeyed.

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51. Petitioner suffered concrete prejudice from the deficient procedure. The denial of a continuance left him unable to obtain documents from his hospitalized sponsor or fully develop the proposed sponsor evidence bearing on release. Petitioner nevertheless answered where his sponsor lived, when they last spoke, and how they knew one another. At the same hearing, the Government presented no affirmative evidence of danger and stated that it was premature to argue flight risk, yet the Immigration Judge found both danger and flight risk based substantially on the prior merits denial and Petitioner's inability, while unprepared, to recall the basis for denial of other relief. The lack of preparation therefore was not harmless: it restricted Petitioner's ability to rebut the asserted risks and present available evidence relevant to release before the Immigration Judge ordered continued confinement. That prejudice remains ongoing because Petitioner has now been detained for nearly twenty-two months under a ruling reached without the sponsor evidence and organized record that additional preparation time would have permitted him to present.

52. The All Writs Act authorizes this Court to issue orders necessary or appropriate in aid of its jurisdiction. 28 U.S.C. § 1651(a). Courts possess inherent authority to compel compliance with lawful orders. *Shillitani v. United States*, 384 U.S. 364, 370 (1966); *Spallone v. United States*, 493 U.S. 265, 276 (1990).

53. Accordingly, the Court should enforce its April 3, 2026, judgment by directing a prompt new bond hearing that affords Petitioner reasonable preparation time, places the burden on the Government by clear and convincing evidence, considers reasonable alternatives to detention and ability to pay, and requires specific individualized findings. Petitioner alternatively requests release under reasonable conditions if the Court concludes that a further hearing would not timely or adequately remedy the continuing violation.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant the Motion and enter an order:

1. Enforcing the Court's April 3, 2026, judgment;
2. Ordering Petitioner's release from ICE custody under reasonable conditions of supervision if the Court concludes that an additional hearing would not timely or adequately remedy the continuing violation;

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3. Alternatively, ordering Respondents to provide a prompt new bond hearing before a neutral adjudicator that affords Petitioner reasonable time to prepare and present available sponsor evidence, places the burden on the Government by clear and convincing evidence, considers reasonable alternatives to detention and ability to pay, and requires specific individualized findings based on present evidence;

4. Requiring Respondents to file a notice of compliance within five (5) days after any renewed bond hearing, including the result of the hearing;

5. Issuing an Order to Show Cause why Respondents should not be held to have failed to comply with the judgment, if the Court deems such relief appropriate;

6. Awarding attorney's fees and costs where authorized by law; and

7. Granting any further relief the Court deems just and proper.

DATED: October 12, 2026

Respectfully submitted,

Naira Zohrabyan
Attorney for Petitioner

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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date I filed this Motion to Enforce Judgment using the Court's CM/ECF system.

DATED: October 12, 2026

Respectfully submitted,

Naira Zohrabyan
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