

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOSE LUCAS MARTINEZ AGUILAR,

Petitioner,

v.

JOSEPH D. MCDONALD, *et al.*,

Respondents.

No. 1:25-cv-13638-LTS

**RESPONSE TO MOTION TO ENFORCE JUDGMENT (Doc. No. 12)**

At Petitioner Jose Lucas Martinez Aguilar’s Court-ordered bond hearing on May 18, 2026, an immigration judge denied bond on the ground that Petitioner “is a flight risk by a preponderance of the evidence and there is no bond amount that will mitigate his risk of flight.” Doc. No. 11-1 at 1. Now, Petitioner moves for this Court to order his immediate release. Doc. No. 12 at 4. Petitioner argues that the immigration judge erred by concluding that Petitioner posed a flight risk. *Id.* at 1–2.

Respondents submit that Petitioner’s motion to enforce raises similar issues to those recently addressed by this Court in *Palma Aguirre*.<sup>1</sup> Should the Court follow its reasoning in *Palma Aguirre*, it would reach the same result here. Accordingly, Respondents respectfully submit that the Court can resolve this motion without further briefing or oral argument.<sup>2</sup>

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<sup>1</sup> Order on Motion to Enforce Judgment, *Palma Aguirre v. Moniz*, 26-cv-11927-LTS (D. Mass. May 21, 2026), Doc. No. 16 at 3.

<sup>2</sup> Respondents reserve all rights, including the right to appeal. Pursuant to the Court’s Order (Doc. No. 15), Respondents submitted the audio recording of Petitioner’s bond hearing to the Court on June 4, 2026. Respondents also attach hereto copies of all exhibits submitted to the immigration judge for purposes of the bond hearing.

Dated: June 5, 2026

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorneys of record by means of the Court's Electronic Case Filing system on June 5, 2026.

/s/ Julian N. Canzoneri  
Julian N. Canzoneri  
Assistant U.S. Attorney