

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA

v.

KILMAR ARMANDO ABREGO GARCIA,

Defendant.

No. 3:25-cr-115

Judge Waverly D. Crenshaw, Jr.

**MOTION TO STAY ISSUANCE OF RELEASE ORDER IN EVENT
OF DENIAL OF MOTION FOR REVOCATION**

In the event the Court denies the government's motion for revocation, Mr. Abrego, with the government's consent, seeks a 30-day stay of the issuance of any release order.

We have been advised by the government that if the Court denies the government's motion for revocation, the defendant would be transferred to the custody of the Department of Homeland Security ("DHS"), and DHS would begin removal proceedings. Given the uncertainty of the outcome of any removal proceedings, Mr. Abrego respectfully requests that, should the Court deny the government's motion for revocation, the issuance of an order releasing Mr. Abrego be delayed for 30 days to allow Mr. Abrego to evaluate his options and determine whether additional relief is necessary.

The government does not object to this request, and such a short delay will not affect the parties' ability to confer regarding a proposed scheduling order or to prepare for trial. The government has informed defense counsel that it will continue producing discovery during this 30-day time period, the parties will continue to collaborate on a scheduling order in advance of the July 30, 2025 deadline, and do not anticipate continuance of the January 27, 2026 trial date due to this requested relief.

Dated: July 20, 2025
New York, New York

Respectfully submitted,

/s/ Sean Hecker
Sean Hecker*
Jenna M. Dabbs*
David Patton*
HECKER FINK LLP
350 Fifth Avenue, 63rd Floor
New York, NY 10118
Telephone: (212) 763-0883
Fax: (212) 564-0883

shecker@heckerfink.com
jdabbs@heckerfink.com
dpatton@heckerfink.com

* admitted *pro hac vice*

Rascoe Dean (No. 034209)
SHERRARD ROE VOIGT & HARBISON PLLC
1600 West End Avenue, Suite 1750
Nashville, Tennessee 37203
Telephone: (615) 742-4200
Fax: (615) 742-4539
rdean@srvhlaw.com

*Counsel for Defendant Kilmar Armando
Abrego Garcia*

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2025, I electronically filed the foregoing document with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following: Acting United States Attorney, Robert E. McGuire, 719 Church Street, Suite 3300, Nashville, Tennessee 37203; Assistant United States Attorney, Jason Harley, 210 Park Avenue, Suite 400, Oklahoma City, Oklahoma 73102.

/s/ Sean Hecker