

United States Court of Appeals
for the Fifth Circuit

No. 25-60456
Summary Calendar

United States Court of Appeals
Fifth Circuit

FILED

February 25, 2026

Lyle W. Cayce
Clerk

ALBERTO G. LOVO ROJAS,

Petitioner,

versus

PAMELA BONDI, *U.S. Attorney General,*

Respondent.

Petition for Review of an Order of
the Board of Immigration Appeals
Agency No. A201 742 867

Before SMITH, HIGGINSON, and WILSON, *Circuit Judges.*

PER CURIAM:*

Alberto Lovo Rojas petitions for review of the denial, by the Board of Immigration Appeals (“BIA”), of his motion to reopen his removal proceedings. The BIA determined Lovo Rojas’s motion to be untimely and numerically barred. In light of *Dije v. Garland*, 39 F.4th 280, 286–87 (5th Cir. 2022), and *Garcia-Morin v. Bondi*, 152 F.4th 626, 632–35 (5th Cir. 2025),

* This opinion is not designated for publication. See 5TH CIR. R. 47.5.

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petition for cert. filed (Dec. 10, 2025) (No. 25-693), we agree.

Lovo Rojas contends that due process requires the numerical limit on motions to reopen to be tolled where, as here, the proceedings were allegedly affected by ineffective assistance of counsel. He similarly avers that the BIA violated his due process rights when it declined to reopen his proceedings *sua sponte*.

To the extent we have jurisdiction over the latter contention, both challenges fail, as we have consistently held that no liberty interest exists in motions to reopen that would implicate due process. *See Mejia v. Whitaker*, 913 F.3d 482, 490 (5th Cir. 2019). The petition for review is DENIED.