

1 District Judge James L. Robart
2 Magistrate Judge Brian A. Tsuchida
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8 UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 CARLSO VELASCO GOMEZ

12 Petitioner,

13 v.

14 BRUCE SCOTT, *et al.*;

Respondents.

CASE NO.: 2:25-cv-522-JLR-BAT

**PETITIONER'S MOTION FOR
PRELIMINARY INJUNCTION AND
STAY OF REMOVAL**

Noting Date: May 23, 2025

15
16 **I. INTRODUCTION**

17
18 Under FRCP 65 and 5 U.S.C. §705, Petitioner moves this Court for a Preliminary
19 Injunction and Stay of Removal, preventing his removal from the United States, and his transfer
20 to another detention facility while these proceedings are pending.

21 **II. BASIS FOR MOTION**

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1 A. **Summary of Procedural and Factual History**

2 The petitioner, Mr. Carlos Velasco Gomez (“Mr. Velasco Gomez” or “Petitioner”), is a
3 native and citizen of Mexico. In his complaint for writ of habeas corpus, Mr. Velasco Gomez
4 seeks relief from unlawful government restraint in violation of the Immigration and Nationality
5 Act (INA) and the Due Process Clause of the Fifth Amendment.

6 Mr. Velasco Gomez was granted deferred action by the Vermont Service of USCIS, on
7 May 25, 2023, following a determination that his I-918 Petition was *bona fide*. (Dkt. 1, Exh. 4).

8 On October 10, 2024, CBP reinstated Mr. Velasco Gomez’s May 2011 removal, placing
9 him on OSUP and requiring regular ICE check-ins, after he accidentally drove to the U.S.-
10 Canadian border and was denied entry to Canada. (Dkt. 1, Exhs. 5, 6).

11 On November 14, 2024, DHS issued a Bona Fide Employment Authorization Document
12 (“BFD EAD”) to Mr. Velasco Gomez, thereby granting him deferred action and placing him on
13 the U visa waitlist, deferring his deportation to Mexico, while he awaits a U visa to become
14 available under the statutory cap. (Dkt. 1, Exhs. 4, 7).

15 Mr. Velazco Gomez appeared for his ICE check-ins as scheduled on October 23, 2024,
16 and January 21, 2025. (Dkt. 1, Exh. 8). Nevertheless, he was arrested by immigration officials
17 on January 26, 2025, and he has been detained at NWIPC since. At no time has Mr. Velasco
18 Gomez been notified that his grant of deferred action or that his BFD EAD has been revoked or
19 terminated.

20 On January 31, 2025, Mr. Velasco Gomez filed an I-246 Request for Stay of Removal
21 and Request to End OSUP with the Tacoma Office of ICE. On March 11, 2025, ICE denied the

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1 I-246 and request to end OSUP because Mr. Velasco Gomez *has been granted deferred action*,
2 and had claimed fear of return while in detention, and therefore his removal is not imminent.
3 (Dkt. 1, Exh. 9). On March 24, 2025, Mr. Velasco Gomez filed the habeas action herein. (Dkt.
4 1).

5 Pursuant to 28 U.S.C. § 2243, this Court issued an Order on March 25, 2025, ordering
6 the government to file a return and status report explaining why the Court should not grant
7 petitioner's petition. (Dkt. 2).

8 On April 25, 2025, the government filed a motion to dismiss this habeas action and
9 sought to remove Mr. Velasco Gomez to Mexico on April 29, 2025. (Dkts. 4, 5). Mr. Velasco
10 Gomez filed a motion for an emergency temporary restraining order on April 28, 2025. (Dkt. 6).

11 Also on April 28, 2025, Mr. Velasco Gomez also filed a separate APA Complaint
12 challenging Respondent's arbitrary and capricious decision to *per se* revoke his grant of
13 deferred action, by detaining him and seeking to execute his removal to Mexico, without "good
14 cause shown," notice and opportunity to respond as required by the applicable regulations. *See*
15 *Velasco Gomez v. Noem*, Civil Action No. 2:25-cv-783-GJL, Dkt. 1 (W.D. Wash. Mar. 24,
16 2025). In so doing, Respondents also violated Petitioner's right to due process under the law. *Id.*
17 Mr. Velasco Gomez will be seeking to consolidate these actions as soon as service of process is
18 complete.

19 On April 29, 2025, the Court granted Petitioner's motion for temporary restraining order
20 for 14 days. (Dkt. 7). The order prevents Mr. Velasco Gomez from being removed from the
21 United States, and ICE has removed him from the removal manifest, for now.

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1 Subsequent to this Court granting his TRO motion, on April 30, 2025, Petitioner's
2 counsel for his I-918 Petition and I-246 Stay of Removal, received a letter from ICE, which is
3 back-dated to March 24, 2025, but signed on April 24, 2025, in which ICE *sua sponte*
4 reconsidered the grounds for denying Mr. Velasco Gomez's I-246 Stay of Removal. Instead of
5 denying the stay because he has been "granted deferred action" and is therefore "not subject to
6 imminent removal," ICE has now denied the stay because the "totality of the circumstances do
7 not support a favorable exercise of discretion. (See Exh. 11-1).

8 Mr. Velasco Gomez now files the motion for preliminary injunction herein.

9 III. LEGAL ARGUMENT

10 A. Standards for Preliminary Injunction

11 "The same standard applies to both temporary restraining orders and to preliminary
12 injunctions." *Sterling Commercial Credit-Michigan, LLC v. Phoenix Industries I, LLC*, 762 F.
13 Supp. 2d 8, 12 (D.D.C. 2011) (quoting *Hall v. Johnson*, 599 F. Supp. 2d 1, 3 n.2 (D.D.C.
14 2009)). To grant a preliminary injunction, the plaintiff must meet one of two tests. The more
15 recent test, known as the *Winter* test, requires the plaintiff to prove as follows: "(1) that he is
16 likely to succeed on the merits, (2) that he is likely to suffer irreparable harm in the absence of
17 preliminary relief, (3) that the balance of equities tips in his favor, and (4) that an injunction is
18 in the public interest." *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1127 (9th Cir. 2009) (quoting,
19 *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008)). "Where, as here, the
20 government opposes a preliminary injunction, the third and fourth factors merge into one
21 inquiry." *Porretti v. Dzurenda*, 11 F.4th 1037, 1047 (9th Cir. 2021).

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1 The traditional test, which remains viable in the Ninth Circuit, is known as the “sliding
2 scale” test and requires the plaintiff to prove “serious questions going to the merits” and “a
3 hardship balance that tips sharply toward the plaintiff.” *Alliance For The Wild Rockies v.*
4 *Cottrell*, 632 F.3d 1127 (9th Cir. 2011). As under the *Winter* test, the plaintiff must also show a
5 likelihood of irreparable injury, and that the injunction is in the public interest. “Under this
6 approach, the elements of the preliminary injunction test are balanced, so that a stronger
7 showing of one element may offset a weaker showing of another.” *Alliance For The Wild*
8 *Rockies*, 632 F.3d at 1131.

9 Mr. Velasco Gomez meets both these tests.

10 ***B. Mr. Velasco Gomez is likely to succeed on the merits and has raised serious legal***
11 ***questions.***

12 As both the habeas and APA Complaint set out, the Petitioner/Plaintiff, Mr. Velasco
13 Gomez has been granted deferred action and is therefore lawfully present in the U.S. until such
14 time as that grant is revoked or terminated, under the applicable regulations. (Dkt. 1, at ¶¶ 42-
15 46; *Velasco Gomez*, No. 2:25-cv-783-GJL, Dkt. 1, at ¶¶ 47-52). *See* 8 U.S.C. § 1182(a)(9)(B),
16 8 C.F.R. § 214.14(d)(3); 8 C.F.R. § 274a.12(c)(14); *see also* 1 USCIS-PM H.2(A)(4); AFM
17 40.9.2(b)(3)(J) (PDF, 1017.74 KB); *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S.
18 471, 483–84 (1999). His removal is stayed by the grant of deferred action and detaining him in
19 furtherance of a removal that cannot be executed is unlawful.

20 By granting Mr. Velasco Gomez deferred action and BFD EAD, DHS/USCIS has not
21 only already determined that his petition for U nonimmigrant status is bona fide, but the

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1 Agency has also reviewed and conducted background checks, and determined that he poses no
2 risk to national security or public safety, and considered other relevant discretionary factors,
3 and decided to exercise favorable discretion, to place him on the waitlist and to stay his
4 removal. 3 USCIS-PM C.5(C)(1); *see also* 8 U.S.C. § 1182(a)(3). Furthermore, the existence
5 of a prior removal order is not a bar to either a U visa or a BFD grant, as DHS/USCIS must
6 first consider all inadmissibility grounds, including prior removal orders and re-entries, in
7 making its BFD determination. *See* 6 USCIS-PM B; 3 USCIS-PM C.

8 While a petitioner for U nonimmigrant status may be removed from the waiting list and
9 a prior grant of deferred action terminated at the discretion of DHS/USCIS; however,
10 DHS/USCIS is bound by the regulations governing the revocation of employment
11 authorization because they are inextricably linked, deferred action commences upon the grant
12 of a BFD EAD and ends upon its revocation (or expiration). *See* 3 USCIS-PM C.6(B); *see also*
13 8 C.F.R. § 274a.14(b)(1). As such there must be “good cause shown” for the revocation. *Id.* A
14 noncitizen must also be provided with written notification of the intent to revoke, the reasons it
15 is warranted, and given 15 days to respond. 8 C.F.R. § 274a.14(b)(2).

16 Here, Petitioner has raised “serious questions going to the merits” regarding whether he
17 has been deprived of due process by the government.” *Alliance For The Wild Rockies*, 632
18 F.3d at 1127. Furthermore, Petitioner has raised a very strong argument that the government is
19 not following its own regulations and policies, as it should be. “It is contrary to law for an
20 agency to disregard its own regulations and policies.” *See Doe v. Lyons*, No. 2:25-cv-00708-
21 DGE, 2025 U.S. Dist. LEXIS 79241, at *11-12 (W.D. Wash. Apr. 25, 2025 (citing *Nat'l Ass'n*

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1 *of Home Builders v. Norton*, 340 F.3d 835, 852 (9th Cir. 2003) [*12]; *see also Wallace v.*
 2 *Christensen*, 802 F.2d 1539, 1552 n.8 (9th Cir. 1986) (an agency is “bound by its own
 3 regulations so long as they remain in force”).

4 Likewise, in its order granting the TRO, this Court noted that “the likelihood of success
 5 factor leans in favor of Petitioner, because, as this Court reasoned, “although the Petitioner has
 6 met the initial *prima facie* requirement for an administrative stay [of removal], which should be
 7 reviewed by the Secretary of Homeland Security to determine whether a stay should be
 8 granted, Respondents appear to argue they can remove him without such review.” (Dkt. 7, at
 9 5); *see Raghav v. Jaddou*, No. 2:25-cv-00408, 2025 WL 373638.

10 Mr. Velasco Gomez asks this Court to make a similar finding with respect to this
 11 preliminary injunction motion herein.

12 **C. Mr. Velasco Gomez faces irreparable harm, and hardship tips sharply toward him.**

13 As he argued successfully in his TRO motion, Mr. Velasco Gomez faces substantial
 14 hardships and irreparable harm if he is removed from the United States while this litigation is
 15 pending. His removal to Mexico would moot the basis of both of his claims, brought forth in
 16 this action and the companion APA action—that he has been granted deferred action and is
 17 therefore lawfully present in the U.S. until such time as that grant is revoked or terminated
 18 under the applicable regulations, and that his removal is stayed by the grant of deferred action
 19 and detaining him in furtherance of a removal that cannot be executed is unlawful. (Dkt. 1, at
 20 ¶¶ 42-46; *Velasco Gomez*, No. 2:25-cv-783-GJL, Dkt. 1, at ¶¶ 47-52). Whether a grant of
 21 “deferred action” legally functions as a “stay of removal” is at the heart of his claim. *Id.*

1 Permitting Mr. Velasco Gomez's removal while litigating whether that removal is lawful
2 defeats the purpose his legal actions and would cause him irreparable harm by depriving him of
3 judicial review. Furthermore, as the Court found in its TRO order, Mr. Velasco Gomez would
4 suffer irreparable harm by being separated from his U.S. Citizen wife of 30 years, children and
5 grandchildren, and thus this factor leans toward him. (Dkt. 7, at 5).

6 Mr. Velasco Gomez is 53 years old and has lived in the United States for the past 14
7 years. His entire immediate family—his wife of 30 years, his two adult children, and two
8 grandchildren—are all U.S. Citizens, and all live in the U.S. He is self-employed and has built
9 a business as an insurance agent over the past 10 years, just signed a new lease for an office
10 space in October 2024, and he has clients who are relying on him. If the government is not
11 enjoined from removing him during the pendency of this litigation, he will be permanently
12 separated from his family and will lose the business he spent a decade building.

13 More than seven months ago, the government found his petition for U nonimmigrant
14 status to be *bona fide*, under the applicable regulations, and he is awaiting only the availability
15 of a visa under the statutory cap, and for the final adjudication of the petition and his I-192
16 waiver of inadmissibility. (Dkt. 1 at ¶¶ 31, 37-41). Mr. Velasco Gomez was subsequently
17 granted a bona fide determination" employment authorization document (BFD EAD), pursuant
18 to its bona fide determination process for U nonimmigrant petitioners, thereby deferring his
19 removal.

20 The grant of deferred action and BFD EAD have not been revoked or terminated in
21 accordance with the applicable regulations, nor did Mr. Velasco Gomez fail to appear for his

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1 ICE check-ins as agreed. *See 8 C.F.R. § 274a.14(b)(1)-(2).* Even so, Mr. Velasco Gomez has
2 been swept up in the current dragnet to detain and deport immigrants. Instead of being
3 permitted to simply live his life and await his U nonimmigrant status in the U.S. in the
4 company of his wife, two adult children and grandchildren, he has been placed in detention,
5 forced into constant fear over what his future now holds, and placed at risk of imminent
6 removal.

7 As successfully argued in his TRO motion, Respondents have refused to return
8 noncitizens to the U.S. who have been unlawfully removed in other high-profile cases. *See,*
9 *e.g., Garcia v. Noem*, Civil Action No. 8:25-cv-00951-PX, 2025 U.S. Dist. LEXIS 68129, at *1
10 (D. Md. Apr. 4, 2025). Furthermore, President Trump has signed multiple executive orders
11 (e.g. Exec. Order No. 14161, 90 FR 8451 (2025); Exec. Order No. 14165, 90 FR 8467 (2025))
12 extremely limiting immigration and entry into the U.S., making it extraordinarily difficult for
13 noncitizens, even those who to seek to enter lawfully, to enter the U.S.

14 Thus, it is paramount to the administration of justice and in furtherance of maintaining
15 family unity that every effort be made to prevent Mr. Velasco Gomez's unlawful, or even
16 potentially unlawful, removal, as there are now significant barriers to his re-entry, and his
17 wrongful removal could cause him irreparable harm in the form of permanent separation from
18 his family.

19 If Mr. Velasco Gomez is removed from the United States and is later granted a U visa,
20 and he is permitted to return through the normal processes (currently curtailed by the Trump
21 Administration), he will face additional legal barriers to returning, such as possibly new

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1 grounds of inadmissibility under 8 U.S.C. §1182, and the unpredictable and discretionary
2 nature of seeking a waiver and consular processing, with extremely long wait times, where an
3 individual consular officer will make their own determination of inadmissibility and may
4 require that a waiver be filed after the interview is conducted.

5 Finally, if Mr. Velasco Gomez is transferred to another detention facility during the
6 pendency of these proceedings, he will lose contact not only with his family, but also with his
7 attorney, in Seattle, Washington. Any further transfer will severely impair, if not cut, his ties
8 with his legal and social supports. And this in turn will limit his ability to succeed on the merits
9 of the litigation and withstand many more weeks of unlawful restraint.

10 ***D. The balance of equities tips in favor of Mr. Velasco Gomez, and an injunction is in
the public interest.***

11 The remaining two factors for an injunction are the same under both legal tests, and
12 they both favor Mr. Velasco Gomez.

13 As to the balance of equities, Mr. Velasco Gomez will suffer great harm if he is
14 removed to Mexico or transferred to another facility, whereas the Defendants will suffer no
15 harm if he is not removed or transferred. The Defendants have already determined that Mr.
16 Velasco Gomez qualifies for a U visa, but he must wait until one becomes available under the
17 statutory cap of 10,000 visas per fiscal year. 8 C.F.R. § 214.14(d)(2); *see also* 3 USCIS-PM
18 C.6. The government's only potential counterargument is that they have an interest in the law
19 being enforced, but Mr. Velasco Gomez has the same interest. He would like the government
20 to follow its own regulations and policy regarding the U visa waitlist and deferred action, to
21

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1 refrain from unlawful restraint, and to seek the removal of noncitizens who have been granted
2 legal protection against such removal.

3 As argued in his TRO motion, a U visa is currently unavailable to Mr. Velasco Gomez
4 solely because the government has set the annual statutory cap far too low to accommodate the
5 number of immigrants who have suffered violent crime, allowing a backlog to form. 8 C.F.R.
6 §214.14(d)(1). The government could either raise the cap or narrow the visa qualifications, but
7 instead it allows the current backlog to continue, harm noncitizens like Mr. Velasco Gomez
8 who must wait many years for a U visa for which they are clearly eligible, with uncertain
9 immigration status, while claiming an interest in justice. There is no valid argument that
10 Defendants will suffer any inequity if Mr. Velasco Gomez waits in the United States for his U
11 visa petition to be adjudicated, or if he remains at NWIPC.

12 Granting a preliminary injunction in favor of Mr. Velasco Gomez is in the public
13 interest as it is in the public interest for the government to follow its own laws and regulations,
14 and to be held accountable by the judiciary when it fails to do so. Having failed to protect Mr.
15 Velasco Gomez and other immigrants from crime, the government has at least offered them the
16 succor of a U visa, if only to further its own interest in fighting crime. The government has also
17 created the U visa backlog. Now, having determined that Mr. Velasco Gomez qualifies for the
18 U visa, having granted him deferred action, which by all accounts should protect him from
19 removal, it has detained him without legal justification and is seeking to remove him
20 unlawfully. Instead of offering safety, it threatens him with deportation. It is in the public's
21 interest to offer assistance to crime victims, to accept their help in fighting crime, to allow

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1 litigants to remain in touch with their lawyers, to allow to prisoners to stay in touch with their
2 families and their lawyers, and to have a government that adjudicates petitions with dispatch.

3 Further, this administration is developing a pattern of deporting individuals from the
4 United States without providing proper process and without allowing them access to federal
5 review. That is exactly what Defendants will accomplish if they are permitted to remove Mr.
6 Velasco Gomez. Understanding that a federal court is reviewing their actions, they instead seek
7 to deport the plaintiff and deprive this court of jurisdiction. Allowing the executive to eschew
8 federal review sets a terrible precedent for the power of the courts to review the actions of an
9 overzealous executive. It is in times of great conflict and often overwhelming public pressure
10 that the judiciary must stay strong and ensure that individuals are afforded the opportunity to
11 access the laws that were passed by Congress and the regulations that were promulgated by the
12 very agencies that now seek to overstep.

13

14 **IV. CONCLUSION**

15 Under FRCP 65, the plaintiff moves this Court to issue an Injunction and Stay of
16 Removal:

17 1. Enjoining and restraining the Respondents and all of their respective officers,
18 agents, servants, employees, attorneys and persons acting on their behalf in
19 concert or in participation with them from:
20 a. Removing or deporting Mr. Velasco Gomez from the United States while
21 his U visa petition is pending; and

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b. Transferring Mr. Velasco Gomez from the Northwest ICE Processing Center to any other facility during the pendency of these proceedings.

WHEREFORE, for the reasons set forth in his Petition for Writ of Habeas Corpus, in his Complaint for Relief Under the APA, and in this Motion, the Petitioner respectfully requests this Court:

1. Grant this Motion for Preliminary Injunction and Stay of Removal for the pendency of this litigation;
2. Enter the Proposed Order Granting Petitioner's Motion for Preliminary Injunction and Stay of Removal; and
3. Grant such other and further relief as justice may require.

Dated this 9th day of May, 2025.

/s/ Minda A. Thorward

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that today I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Defendant's counsel, Michelle Lambert.

Dated this 9th day of May, 2025.

/s/ Minda A. Thorward
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