

THE HONORABLE TANA LIN
THE HONORABLE GRADY J. LEUPOLD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AVEL IVANOVICH REVENKO,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; DREW BOSTOCK,
Seattle Field Office Director, United
States Citizenship and Immigration
Services; WARDEN of Immigration
Detention Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No. CV 25-549-TL-GJL

AVEL REVENKO'S RESPONSE TO
ORDER TO SHOW CAUSE

In response to the Court's Order to Show Cause why his petition should not be dismissed, dkt 4, Avel Ivanovich Revenko respectfully offers the attached application to proceed in forma pauperis. Exhibit A. If the Court requires a certification from the detention facility, Mr. Revenko moves the Court for a two-week extension of time to respond to the Court's Order to Show Cause.

I. BACKGROUND

Mr. Revenko, a stateless immigrant who has been confined at the Northwest ICE Processing Center since April 11, 2023, petitioned the Court to authorize his release on conditions pursuant to *Zadvydas v. Davis*, 533 U.S. 678 (2001). Because Mr. Revenko

1 suffers from mental illness that renders him incompetent, Mr. Revenko completed that
2 petition with the pro bono assistance of counsel that had been appointed by the
3 immigration court. *See Franco v. Holder*, CV-10-02211 DMG (DTBx) (class action
4 agreement providing counsel to mentally ill immigration respondents in three states).

5 The Court issued an Order to Show Cause why Mr. Revenko's petition should
6 not be denied for failure to submit evidence of his financial resources. Working with
7 *Franco* counsel, Mr. Revenko completed an application to proceed *in forma pauperis*.
8 Unfortunately, his incompetency means that Mr. Revenko did not comply with the
9 form's requirement that he obtain a certification confirming the funds in his
10 commissary account.

11 **II. REQUEST**

12 Mr. Revenko has no income and no funds. He therefore respectfully asks the
13 Court to accept the attached application to proceed in forma pauperis as is and appoint
14 undersigned counsel on the sworn contents of the application. Alternatively, he asks the
15 Court to extend the deadline to obtain the needed certification by two weeks so that
16 counsel can attempt to get the certification from the Northwest ICE Processing Center.
17 If the Court extends the deadline, he asks that the Court not extend the noting date of
18 his petition so that consideration of his request for release is not unduly delayed.

19 DATED this 4th day of April, 2025.

20
21 Respectfully submitted,

22 s/ *Avel Ivanovich Revenko*
23 Avel Ivanovich Revenko
24 (By Gregory Murphy, AFRD)
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