

1 Javon Ricardo Gordon
2 ~~At~~
3 Northwest Detention Center
4 1623 East J Street
5 Tacoma, WA 98421-1615

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7
8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 JAVON RICARDO GORDON,) NO. C

12 Petitioner,

13 v.

14 PAMELA BONDI, Attorney General of
15 the United States; KRISTI NOEM,
16 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,

17 Respondents.

18 REQUEST FOR APPOINTMENT OF
19 COUNSEL

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21 Petitioner Javon Ricardo Gordon hereby requests that the Court appoint the
22 office of the Federal Public Defender for the Western District of Washington, or such
23 other counsel as the Court may deem appropriate, to represent him in this matter.
24 Petitioner does not have the financial resources to retain counsel as he is presently in
25 custody. For these reasons, and because the present petition presents novel and complex
26 issues of law, appointment of counsel would serve the interests of justice. Many other
ICE detainees are or will be raising similar habeas challenges against respondents, and

1 this Court will benefit from the contributions of experienced, federal counsel in
2 examining these claims. In addition, if an evidentiary hearing is necessary in this case,
3 petitioner will need the assistance of counsel for such a hearing.

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5 DATED this 14th day of April, 2025.

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8 Respectfully submitted,

9  [SIGN NAME]
10 Javon Ricardo Gordon
11 A# 
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