

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JAVEIN JUMEL COKE,

Petitioner,

v.

BRUCE SCOTT, *et al.*,

Respondents.

Case No. 2:25-cv-00694-RSM-BAT

FEDERAL RESPONDENTS'<sup>1</sup>  
OPPOSITION TO PETITIONER'S  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE

Noted for Consideration:  
June 16, 2025

**I. INTRODUCTION**

Petitioner Javein Jumel Coke fails to make a clear showing that he is entitled to the extraordinary remedy of a temporary restraining order ("TRO") releasing him from immigration detention. Dkt. No. 12, TRO Mot. U.S. Immigration and Customs Enforcement ("ICE") has lawfully detained Coke, a Jamaican citizen, for approximately thirteen months pursuant to Section 236(a) of the Immigration and Nationality Act ("INA"), codified at 8 U.S.C. § 1226(a), pending the issuance of a final order of removal. During this time, Coke has not sought a bond

<sup>1</sup> Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 redetermination hearing from the immigration court. Coke filed this motion alleging that he is  
2 being subjected to indefinite detention in violation of due process and is entitled to release. TRO  
3 Mot., at 1. His detention is not indefinite: he will either be removed from the country or released  
4 pending the issuance of a final order of removal.

5 Coke has not demonstrated that the law and facts clearly favor the grant of emergency  
6 mandatory injunctive relief here. First, Coke is unlikely to succeed on the merits of his case. In  
7 the habeas petition, Coke asserts that his continued immigration detention violates due process  
8 because an IJ has granted him deferred removal to Jamaica under the Convention Against  
9 Torture ("CAT"). Dkt. No. 1, Pet. However, the U.S. Department of Homeland Security  
10 ("DHS") has appealed this decision to the Board of Immigration Appeals ("BIA"). While this  
11 appeal is pending, and Coke's removal proceedings remain ongoing, his detention is lawful. 8  
12 C.F.R. § 208.17(c).

13 Contrary to his assertions, Coke is not subject to mandatory detention and could request a  
14 bond redetermination hearing with the immigration court. 8 C.F.R. § 236.1(d)(1). Rather than  
15 utilizing the "substantial procedural protections" available under Section 1226(a), Coke has  
16 failed to exhaust his administrative remedies and improperly asks this Court to release him.  
17 *Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1214 (9th Cir. 2022). For this reason alone, the  
18 habeas petition should be dismissed.

19 In all, the motion is procedurally improper in that Coke is not asking the Court to  
20 preserve the status quo pending further proceedings. Instead, he effectively asks the Court to  
21 rule immediately in his favor on the ultimate issue in this case and to grant him the relief that he  
22 seeks in his habeas petition. The briefing and adjudication of the habeas petition in the ordinary  
23 course are the appropriate mechanism for resolving the legal issues presented in Coke's TRO  
24 Motion. *See Guy v. Tanner*, 2014 WL 2818684, at \*3 (E.D. La. June 23, 2014) ("[petitioner's]

1 motion [for TRO] is no more than a veiled attempt to expedite the resolution of his habeas  
2 petition”). Federal Respondents have filed their return, and Coke has the opportunity to respond  
3 to the filing.<sup>2</sup>

4 Accordingly, Federal Respondents respectfully request that the Court deny Coke’s TRO  
5 motion.

## 6 II. FACTUAL BACKGROUND

7 Coke is a citizen of Jamaica who entered the United States in 2008 with a temporary  
8 visitor’s visa. Dkt. No. 10, Delgado Decl., ¶ 3; Dkt. No. 11, Lambert Decl., Ex. A, Form I-213.  
9 He overstayed his visa by failing to depart the United States when required and has remained in  
10 the United States without authorization since that time. Delgado Decl., ¶ 3. In 2017, Coke used  
11 another person’s identity to falsely claim that he was a U.S. citizen. Lambert Decl., Ex. B,  
12 Criminal Records, Indictment, at L70. In January 2023, Coke pled guilty to the offense of  
13 Aggravated Identification Theft, in violation of 18 U.S.C. § 1028A, and was sentenced to 24  
14 months of prison. Delgado Decl., ¶ 4; Lambert Decl., Ex. B, Criminal Records.

15 DHS issued Coke a Notice to Appear (“NTA”) that charged him as removable under 8  
16 U.S.C. § 1227(a)(1)(B) due to overstaying his visa. Delgado Decl., ¶ 5; Lambert Decl., Ex. C,  
17 Notice to Appear; Ex. D, Warrant for Arrest. ICE took custody of Coke upon his release from  
18 prison on April 23, 2024. Delgado Decl., ¶ 5. At that time, ICE determined that Coke would be  
19 detained pending a final administrative determination. Lambert Decl., Ex. E, Notice of Custody  
20 Determination. There is no record that Coke has filed a request for a bond redetermination  
21 hearing with the IJ. Delgado Decl., ¶ 10.

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24 <sup>2</sup> Although Federal Respondents filed the return on May 27, 2025 (Dkt No. 9), the return was not served on Coke until June 12, 2025, due to an oversight. To provide Coke with time to respond to the return, Federal Respondents have renoted the return. Dkt. No. 14.

1 The IJ sustained the NTA's charge of removability. Pet., Ex. F, at 1. Thereafter, Coke  
2 applied for various forms of protection from removal. Delgado Decl., ¶ 6. On October 23, 2024,  
3 an IJ ordered Coke removed to Jamaica and granted Coke's application for deferral of removal  
4 under CAT. *Id.* The following month, DHS filed a timely appeal of the IJ's grant of CAT  
5 deferral with the BIA. *Id.*, ¶ 7. The BIA placed the appeal on hold in April 2025 pursuant to 8  
6 C.F.R. § 1003.1(d)(6)(ii), pending confirmation that background check requirements have been  
7 met. *Id.*, ¶ 12. DHS has notified the BIA that background checks are complete. Enrique  
8 Rodriguez Decl., ¶ 4.

### 9 III. LEGAL STANDARD

10 The standard for issuing a temporary restraining order is "substantially identical" to the  
11 standard for issuing a preliminary injunction. *Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*,  
12 240 F.3d 832, 839 n.7 (9th Cir. 2001). "It frequently is observed that a preliminary injunction is  
13 an extraordinary and drastic remedy, one that should not be granted unless the movant, *by a clear*  
14 *showing*, carries the burden of persuasion." *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997)  
15 (emphasis in original) (internal quotations omitted); *Winter v. Nat. Res. Def. Council, Inc.*, 555  
16 U.S. 7, 22 (2008). For mandatory preliminary relief to be granted, Coke "must establish that the  
17 law and facts *clearly favor* [his] position." *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir.  
18 2015) (emphasis in original). "Where a party seeks mandatory preliminary relief that goes well  
19 beyond maintaining the status quo pendente lite, courts should be extremely cautious about  
20 issuing a preliminary injunction." *Martin v. International Olympic Committee*, 740 F.2d 670,  
21 675 (9th Cir. 1984). "A plaintiff seeking a preliminary injunction must show that: (1) [he] is  
22 likely to succeed on the merits, (2) [he] is likely to suffer irreparable harm in the absence of  
23 preliminary relief, (3) the balance of equities tips in her favor, and (4) an injunction is in the  
24

1 public interest.” *Id.* (internal quotation omitted). Alternatively, a plaintiff can show that there  
2 are “serious questions going to the merits and the balance of hardships tips sharply towards  
3 [plaintiff], as long as the second and third *Winter* factors are satisfied.” *Disney Enters., Inc. v.*  
4 *VidAngel, Inc.*, 869 F.3d 848, 856 (9th Cir. 2017) (internal quotation omitted).

5 The purpose of preliminary injunctive relief is to preserve the status quo pending final  
6 judgment, rather than to obtain a preliminary adjudication on the merits. *Sierra On-Line, Inc. v.*  
7 *Phoenix Software, Inc.*, 739 F.2d 1415, 1422 (9th Cir. 1984). “A preliminary injunction can take  
8 two forms.” *Marlyn Nutraceuticals, Inc. v. Mucos Pharma GmbH & Co.*, 571 F.3d 873, 878 (9th  
9 Cir. 2009). “A prohibitory injunction prohibits a party from taking action and ‘preserves the  
10 status quo pending a determination of the action on the merits.’” *Id.* (internal quotation omitted).  
11 “A mandatory injunction orders a responsible party to take action.” *Id.*, at 879 (internal  
12 quotation omitted). “A mandatory injunction goes well beyond simply maintaining the status  
13 quo pendente lite and is particularly disfavored.” *Id.* (internal quotation omitted). “In general,  
14 mandatory injunctions are not granted unless extreme or very serious damage will result and are  
15 not issued in doubtful cases.” *Id.* (internal quotation omitted). Where a plaintiff seeks  
16 mandatory injunctive relief, “courts should be extremely cautious.” *Stanley v. Univ. of S.*  
17 *California*, 13 F.3d 1313, 1319 (9th Cir. 1994) (internal quotation omitted). Thus, in a  
18 mandatory injunction request, the moving party “must establish that the law and facts *clearly*  
19 *favor* [his] position, not simply that [he] is likely to succeed.” *Garcia*, 786 F.3d at 740  
20 (emphasis original).

21 Here, rather than preserving the status quo, Coke seeks mandatory injunctive relief in the  
22 form of an order requiring his immediate release.

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**IV. ARGUMENT**

The Court should deny Coke's request for a TRO as he has failed to clearly establish a likelihood of success on the merits on his due process claim or irreparable harm. Additionally, Coke has not established that the public interest weighs decidedly in his favor. Accordingly, and for reasons further discussed below, Federal Respondents respectfully request that the Court deny Coke's request for immediate release from immigration detention.

**A. Coke Does not Satisfy the Requirements for Preliminary Relief.**

**1. *Coke is unlikely to succeed on the merits.***

Likelihood of success on the merits is a threshold issue: "[W]hen a plaintiff has failed to show the likelihood of success on the merits, [the court] need not consider the remaining three *Winters* elements." *Garcia*, 786 F.3d at 740 (internal quotation omitted). To succeed on a habeas petition, Coke must show that he is "in custody in violation of the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241. Coke's constitutional claim is that his detention has become indefinite or prolonged and violates due process. This claim lacks merit.

**a. Coke's detention is lawful.**

Because his removal proceedings are ongoing, Coke is lawfully detained pursuant to 8 U.S.C. § 1226(a). The Ninth Circuit has found that Section 1226(a) and its implementing regulations satisfy due process. *Rodriguez Diaz*, 53 F.4th at 1209-10. Throughout his removal proceedings, Coke has had the right to seek the very relief he seeks here, a bond determination hearing which could lead to his release.

Congress enacted a multi-layered statute that provides for the continued civil detention of noncitizens pending removal. *See Prieto-Romero v. Clark*, 534 F.3d 1053, 1059 (9th Cir. 2008). Where an individual falls within this scheme affects whether his detention is discretionary or mandatory, as well as the kind of review process available. *Id.*, at 1057. This case concerns the

1 Government's responsibilities under 8 U.S.C. § 1226(a), which "authorizes the Attorney General  
2 to arrest and detain an alien 'pending a decision on whether the alien is to be removed from the  
3 United States.'" *Jennings v. Rodriguez*, 583 U.S. 281, 306 (2018) (quoting 8 U.S.C. § 1226(a)).  
4 The Supreme Court has recognized that "there is little question that the civil detention of aliens  
5 during removal proceedings can serve a legitimate government purpose, which is 'preventing  
6 deportable . . . aliens from fleeing prior to or during their removal proceedings, thus increasing  
7 the chance that, if ordered removed, the aliens will be successfully removed.'" *Prieto-Romero*,  
8 534 F.3d at 1065 (citing *Demore v. Kim*, 538 U.S. 510, 528 (2003)).

9 Section 1226(a) provides, in part, as follows:

10 On a Warrant issued by the Attorney General, an alien may be arrested and  
11 detained pending a decision on whether the alien is to be removed from the  
12 United States. Except as provided in subsection (c) of this section and pending  
13 such decision, the Attorney General -

14 (1) may continue to detain the arrested alien; and

15 (2) may release the alien on -

16 (A) bond of at least \$1,500 with security approved by, and  
17 containing conditions prescribed by, the Attorney General; or  
18 (B) conditional parole . . .

19 8 U.S.C. § 1226(a).

20 "Section 1226(a) and its implementing regulations provide extensive procedural protections  
21 that are unavailable under other detention provisions." *Rodriguez Diaz*, 53 F.4th at 1202. Every  
22 noncitizen apprehended under Section 1226(a) is individually considered for release on bond. 8  
23 U.S.C. § 1226(a); 8 C.F.R. § 236.1(c)(8). An ICE officer initially assesses whether the  
24 noncitizen has "demonstrate[d]" that "release would not pose a danger to property or persons,  
and that the alien is likely to appear for any future proceeding." 8 C.F.R. § 236.1(c)(8). If the  
ICE officer denies bond, the noncitizen may ask an IJ for a redetermination of the custody  
decision. 8 C.F.R. § 236.1(d)(1). Thus, the initial bond hearing held before an IJ for a

1 noncitizen detained under Section 1226(a) is also called a “redetermination hearing.” At this  
2 hearing, the noncitizen bears the burden of establishing “that he or she does not present a danger  
3 to persons or property, is not a threat to the national security, and does not pose a risk of flight.”  
4 *Matter of Guerra*, 24 I. & N. Dec. 37, 38 (BIA 2006). Bond hearings are separate and apart  
5 from, and form no part of, a noncitizen’s removal hearings. 8 C.F.R. § 1003.19(d).

6 The noncitizen may appeal the IJ’s custody redetermination to the BIA. 8 C.F.R.  
7 §§ 236.1(d)(3)(i), 1236.1(d)(3)(i); *Leonardo v. Crawford*, 646 F.3d 1157, 1160 (9th Cir. 2011).  
8 Further, a noncitizen who remains detained pursuant to Section 1226(a) after the initial bond  
9 hearing may request that the IJ conduct another custody redetermination whenever  
10 “circumstances have changed materially since the prior bond redetermination.” 8 C.F.R.  
11 § 1003.19(e).

12 Here, ICE determined that Coke would remain in detention. Lambert Decl., Ex. E; 8  
13 C.F.R. § 236.1(c)(8). The simple fact in this case is that Coke has never sought a bond  
14 redetermination hearing before an IJ, which has been available to him under Section 1226(a).  
15 Delgado Decl., ¶ 10; 8 C.F.R. § 236.1(d)(1). This Court should not allow Coke to use habeas to  
16 seek relief that he failed to seek through his administrative proceedings.

17 Finally, the IJ’s grant of CAT deferral of removal to Jamaica does not alter the lawfulness  
18 of his detention while that decision is under administrative appeal. 8 C.F.R. § 208.17(c). A  
19 grant of deferral does not guarantee the alien will be released from custody. *See* 8 C.F.R. §  
20 208.17(b)(1)(ii). Even if the BIA affirms the IJ’s decision and his removal order becomes final,  
21 Coke may still be subject to removal to a third country. CAT deferral is granted from “the  
22 country where [the alien] is more likely than not to be tortured.” 8 C.F.R. § 208.17(a). Removal  
23 is deferred only to the county where the alien is likely to be tortured, and the alien may be  
24



1 removed at any time to another country where he is not likely to be tortured. *See* 8 C.F.R. §  
2 208.17(c).

3 Accordingly, Coke's detention still serves a legitimate immigration purpose.

4 b. Coke has failed to exhaust his administrative remedies.

5 This Court should require Coke to avail himself of the substantial procedural protections  
6 of Section 1226(a) before seeking habeas relief in a federal district court. Coke has never  
7 requested a bond redetermination hearing from an IJ. 8 C.F.R. § 236.1(d)(1). And even if he  
8 were to disagree with an IJ's future bond decision, he would be able to administratively appeal  
9 the decision to the BIA. Therefore, Coke has several layers of process available to him prior to  
10 seeking this Court's intervention.

11 Although exhaustion of administrative remedies is not a jurisdictional prerequisite for  
12 habeas petitions, courts generally "require, as a prudential matter, that habeas petitioners exhaust  
13 available judicial and administrative remedies before seeking [such] relief." *Castro-Cortez v.*  
14 *INS*, 239 F.3d 1037, 1047 (9th Cir. 2001) (abrogated on other grounds by *Fernandez-Vargas v.*  
15 *Gonzales*, 548 U.S. 30 (2006)). The exhaustion requirement is subject to waiver because it is not  
16 a "'jurisdictional' prerequisite." *Id.*

17 Courts may require prudential exhaustion where: "(1) agency expertise makes agency  
18 consideration necessary to generate a proper record and reach a proper decision; (2) relaxation of  
19 the requirement would encourage the deliberate bypass of the administrative scheme; and (3)  
20 administrative review is likely to allow the agency to correct its own mistakes and to preclude  
21 the need for judicial review." *Puga v. Chertoff*, 488 F.3d 812, 815 (9th Cir. 2007).

22 The Court should not allow Coke to move forward with this litigation without first  
23 exhausting his administrative remedies. Like the circumstances here, a court in this district  
24 dismissed a noncitizen's habeas petition because the petitioner had failed to seek a bond

1 redetermination hearing at the administrative level. *Cristobal v. Asher*, 20-cv-1493-RSM-BAT,  
2 2020 WL 8678097, at \* 3 (W.D. Wash. Dec. 14, 2020), *Rep. & Rec. adopted by* 2021  
3 WL796597 (W.D. Wash. Mar. 2, 2021). In *Cristobal*, the petitioner had been detained for 15  
4 months and was denied bond at an initial bond redetermination hearing, but he never sought a  
5 second bond redetermination hearing based on changed circumstances before filing a habeas  
6 petition. In comparison, Coke has not even pursued the preliminary administrative remedy that  
7 the *Cristobal* petitioner had pursued – an initial bond redetermination hearing – before filing a  
8 habeas petition in the district court. Therefore, this Court should also dismiss this Petition.

9 Furthermore, this case meets the elements requiring prudential exhaustion. Even if the IJ  
10 had denied bond, Coke would have had the ability to appeal the denial to the BIA. The BIA “has  
11 a special expertise in reviewing the question of whether the bond record as a whole makes it  
12 substantially unlikely that the Department w[ill] prevail on [the petitioner’s] challenge to  
13 removability.” *Francisco Cortez v. Nielsen*, No. 19-CV-00754-PJH, 2019 WL 1508458, at \*3  
14 (N.D. Cal. Apr. 5, 2019) (internal quotation marks omitted). Also, allowing a “relaxation of the  
15 exhaustion requirement” would promote the avoidance of seeking a bond redetermination by the  
16 IJ or an appeal of similar IJ orders to the BIA. Finally, the outcome of a bond redetermination  
17 hearing before an IJ or a subsequent BIA appeal may provide Coke with the relief sought here –  
18 an individualized bond hearing and ultimately release.

19 Accordingly, Coke is not likely to succeed on the merit of his habeas petition because he  
20 has failed to exhaust his administrative remedies.

21 c. Coke is not entitled to release.

22 This Court should deny Coke’s request for immediate release from immigration  
23 detention. A noncitizen is entitled to release if he can show that his immigration detention is  
24 indefinite as defined in *Zadvydas*. *Hong v. Mayorkas*, No. 2:20-cv-1784, 2021 WL 8016749, at

\*6 (W.D. Wash. June 8, 2021), *report and recommendation adopted*, 2022 WL 1078627 (W.D. Wash. Apr. 11, 2022). While Coke's detention continues while his removal proceedings are ongoing, he cannot allege that his detention has become indefinite. Coke has presented no evidence that ICE will be unable to remove him if his removal order ultimately becomes final. Nor has Coke provided any legal basis for his immediate release from detention while detained pursuant to 8 U.S.C. § 1226(a).

**2. Coke has not shown irreparable harm.**

Coke has not demonstrated that he will suffer irreparable injury absent the mandatory injunctive relief he seeks. To do so, he must demonstrate "immediate threatened injury." *Caribbean Marine Services Co., Inc. v. Baldrige*, 844 F.2d 668, 674 (9th Cir. 1988) (citing *Los Angeles Memorial Coliseum Commission v. National Football League*, 634 F.2d 1197, 1201 (9th Cir.1980)). Merely showing a "possibility" of irreparable harm is insufficient. *See Winter*, 555 U.S. at 22. Moreover, mandatory injunctions are not granted unless extreme or very serious damage will result. *Marlyn Nutraceuticals, Inc.*, 571 F.3d at 879 (internal citation omitted). "Issuing a preliminary injunction based only on a possibility of irreparable harm is inconsistent with [the Supreme Court's] characterization of injunctive relief as an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief." *Winter*, 555 U.S. at 22.

Coke complains that the conditions of his immigration detention have created irreparable injury. TRO Mot., at 6-9. However, "[e]ven if Petitioner could show a Fifth Amendment violation, he does not establish that such a violation would justify immediate release, as opposed to injunctive relief that would leave him detained while ameliorating any unconstitutional conditions at the NWIPC." *Ortiz v. Barr*, No. C20-497-RSM-BAT, 2020 WL 13577427, at \*7 n.8 (W.D. Wash. April 10, 2020).

1 Furthermore, Coke's assertions that he is irreparably harmed due to his purportedly  
2 unconstitutional detention does not satisfy this inquiry for mandatory injunctive relief. It only  
3 "begs the constitutional questions presented in [his] petition by assuming that [P]etitioner has  
4 suffered a constitutional injury." *Cortez v. Nielsen*, 19-cv-754, 2019 WL 1508458, at \*3 (N.D.  
5 Cal. Apr. 5, 2019). Moreover, Coke's "loss of liberty" is "common to all [noncitizens] seeking  
6 review of their custody or bond determinations." *See Resendiz v. Holder*, 12-cv-4850, 2012 WL  
7 5451162, at \*5 (N.D. Cal. Nov. 7, 2012); *see also Leonardo v. Crawford*, 646 F.3d 1157, 1161  
8 (9th Cir. 2011) (not finding irreparable harm where a detained individual was required to exhaust  
9 his appeal of the denial of bond at a *Casas* hearing).

10 Accordingly, Coke has not made a clear showing that he will be subject to immediate  
11 irreparable injury without the requested mandatory injunctive relief.

12 **3. *The balance of the equities and public interests favor the Government.***

13 It is well settled that the public interest in enforcement of United States' immigration  
14 laws is significant. *See, e.g., United States v. Martinez-Fuerte*, 428 U.S. 543, 556-58 (1976);  
15 *Blackie's House of Beef, Inc. v. Castillo*, 659 F.2d 1211, 1221 (D.C. Cir. 1981) ("The Supreme  
16 Court has recognized that the public interest in enforcement of the immigration laws is  
17 significant.") (citing cases); *see also Nken v. Holder*, 556 U.S. 418, 435 (2009) ("There is  
18 always a public interest in prompt execution of removal orders). Furthermore, the immigration  
19 laws and regulations provide for the relief sought here through the administrative process. This  
20 public interest outweighs Coke's private interest here. Coke asks the Court to declare his  
21 detention unconstitutional and release him, despite the Government's valid reasons and statutory  
22 bases for detaining him.

23 Accordingly, this Court should deny his TRO Motion.  
24

1 **B. Coke's Request for an Order to Show Cause is Moot.**

2 Coke asks this Court to order Respondents to file a return on an expedited basis. Federal  
3 Respondents have filed a return. Dkt. No. 9. Therefore, this claim is moot.

4 **V. CONCLUSION**

5 For all the foregoing reasons, Coke has not satisfied his high burden of establishing  
6 entitlement to mandatory injunctive relief, and his TRO Motion should be denied.

7  
8 DATED this 16th day of June, 2025.

9  
10 Respectfully submitted,

11 TEAL LUTHY MILLER  
Acting United States Attorney

12 s/ Michelle R. Lambert  
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17 *Attorneys for Federal Respondents*

18  
19 *I certify that this memorandum contains 3,585*  
20 *words, in compliance with the Local Civil*  
21 *Rules*

1 CERTIFICATE OF SERVICE

2 I hereby certify that I am an employee in the Office of the United States Attorney for the  
3 Western District of Washington and of such age and discretion as to be competent to serve  
4 papers.

5 I further certify on this date, I electronically filed the foregoing and the following  
6 Declaration of Enrique Rodriguez with the Clerk of the Court using the CM/ECF system, which  
7 will send notice of such filing to the following CM/ECF participant(s):

8 - 0 -

9 I further certify on this date, I arranged for service of the foregoing on the following non-  
10 CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as  
11 follows:

12 Javein Inmel Coke, *Pro Se Petitioner*  
13 A#   
14 NW ICE Processing Center  
1623 E. J Street, Suite 5  
Tacoma, WA 98421-1615

15 DATED this 16th day of June, 2025.

16 s/ Katie Reed-Johnson

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