

District Judge James L. Robart
Chief Magistrate Judge Theresa L. Fricke

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BHOLA PAGE,

Petitioner,

v.

THE GEO GROUP, INC., *et al.*,

Respondents.

Case No. 2:25-cv-1108-JLR-TLF

FEDERAL RESPONDENTS'
SUPPLEMENTAL BRIEFING

Noted for consideration on:
November 12, 2025

Pursuant to this Court's Order (Dkt. No. 18), Federal Respondents submit the following supplemental information concerning the pending removal of Petitioner Bhola Page to India. U.S. Immigration and Customs Enforcement ("ICE") secured a travel document to execute his removal to India. De Castro Decl., ¶ 3. Page's removal to India is scheduled for next week. *Id.*, ¶ 4. While the government was unable to obtain a travel document previously leading to Page's release from immigration detention in 2020 (Dkt. No. 7, ¶ 10), circumstances have changed in that the Consulate General of India in Seattle has been cooperative with the government's requests for travel documents. As a result, ICE now has a valid travel document and imminent removal plans for Page.

