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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

HASSAN AMHIRRA,

Petitioner,

Case No.: 2:25-cv-01376-TL

v.

**WARDEN, Northwest Detention
Center,**

Respondent.

PETITIONER'S RESPONSE TO
GOVERNMENT'S STATUS
REPORT

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PETITIONER’S STATUS UPDATE

"Insanity is doing the same thing over and over again and expecting different results" – *Rita Mae Brown*

1. After the 10th hearing to locate a qualified interpreter, the Petitioner’s removal proceedings were rescheduled once again to locate a qualified interpreter.
2. At the federal level, the Court has issued six (6) consecutive orders requiring the submission of a status report. Each status report has stated the same result, which is that no qualified interpreter has been secured.
3. Despite the repetitive nature of these reports and the Immigration Court’s failure to indicate whether a qualified interpreter will be secured for a future hearing, the instant Court continues to issue status report orders, resulting in a repetitive cycle.
4. In sum, In the prior removal proceedings initiated on October 18, 2024, the Petitioner was scheduled for two hearings, including a hearing on October 18, 2024, and again on November 1, 2024.
5. In the currently pending removal proceedings before Immigration Judge Fittings, the Petitioner was scheduled on four (4) occasions for Master Calendar Hearings and on four (4) occasions for Individual Calendar Hearings.
6. Over the course of more than a year of repeated continuances and rescheduled hearings for a total of ten (10) times, the Petitioner has remained detained.
7. During this period of detention, the Petitioner has been unable to obtain even basic necessities, including dental care, due to the absence of an interpreter in his language. The Petitioner has informed counsel that he has been unable to receive

1 necessary dental treatment because he cannot communicate with detention center
2 or medical staff.

3 8. Despite the fact that counsel for the Petitioner has repeatedly and clearly identified
4 the Petitioner's precise language, dialect, and the specific region of Morocco in
5 which the language is spoken—both orally during multiple hearings and in written
6 submissions—the Court has continued to express confusion regarding the
7 Petitioner's language needs.

8 9. Counsel formally notified the Court in writing of the exact interpretation services
9 required, including through a Notice of Interpretation Services Request, the Form
10 I-589, Application for Asylum, Withholding of Removal, and Protection under the
11 Convention Against Torture, as well as through two separate certificates of
12 translation accompanying the Petitioner's written statements. Nevertheless, the
13 Court has continued to repeatedly inquire as to which language and dialect are
14 required, most recently a day prior to the individual hearing scheduled for
15 November 26, 2025.

16 10. This repeated pattern of inquiry demonstrates a clear lack of diligence in securing
17 a qualified interpreter. At the November 26, 2025 individual hearing, the Court
18 provided the same interpreter who had appeared at a prior master hearing, despite
19 the Petitioner's clear and established record that he could not understand that
20 interpreter, thus further evidencing a lack of diligence on the part of the Court.

21 11. Each hearing has concluded identically, with the Court unable to secure a qualified
22 interpreter and thus continuing the matter, only for it to be rescheduled once again
23 for the same reason.

1 12. At no point has there been any indication that the Court either understands the
2 Petitioner's language needs, is efficiently attempting to secure one or is even
3 capable of securing an appropriate interpreter.

4 13. If the Court is not inclined to grant release based on the continued rescheduling of
5 hearings and the inability to move forward with the proceedings, the Court must
6 consider release based on prolonged detention.

7 14. Petitioner has been detained since September 2024, approximately 15 months,
8 well beyond the six-month period considered sufficient to establish prolonged
9 detention. *See Rodriguez v. Robbins*, 715 F.3d 1127 (9th Cir. 2013).\

10 Accordingly, Petitioner respectfully requests that the Court promptly rule on the
11 petition for writ of habeas corpus and schedule a bond hearing.
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16 Dated: December 19, 2025

Respectfully Submitted,

/s/ Rafael Ureña

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Lead Counsel for Petitioner

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23
24 PETITIONER'S RESPONSE TO
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Certificate of Service

I hereby certify that on December 19, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Service of the motion is being made upon all Respondents by operation of the Court’s ECF notification system to Respondents’ counsel of record.

Dated: December 19, 2025

Respectfully Submitted,

/s/ Rafael Ureña

Rafael Ureña, Esq. (Pro Hac Vice to be filed)

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