

THE HONORABLE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Phong Thanh Nguyen,

*Petitioner,*

v.

Bruce SCOTT, Warden, Northwest ICE  
Processing Center; Drew BOSTOCK,  
Enforcement and Removal Operations,  
Seattle Field Office Director, U.S.  
Immigration and Customs Enforcement;  
Kristi NOEM, Secretary, U.S. Department  
of Homeland Security; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,

*Respondents.*

Civil Case No. 2:25-cv-01398

**PETITIONER'S NOTICE OF MOTION  
FOR TEMPORARY RESTRAINING  
ORDER**

**NOTICE OF MOTION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Local Court Rule 65(b), Petitioner Phong Thanh Nguyen hereby requests that the Court issue a temporary restraining order directing Respondents to release Petitioner from the Northwest Immigration and Customs Enforcement Processing Center in Tacoma, Washington and to enjoin Respondents from removing or attempting to remove Petitioner to a third country in violation of the Constitution and statutory procedures pending the resolution of the Petition for Writ of Habeas Corpus. This motion is

NOTICE OF MOTION OF TRO - 1  
Case No. 2:25-cv-01398

1 supported by the following Memorandum of Points and Authorities, and by his Petition for Writ  
2 of Habeas Corpus and supporting exhibits, dated July 24, 2025.

3 Undersigned counsel hereby declares and certifies that on July 24, 2025, immediately  
4 after filing this motion with the Court, she emailed Michelle Lambert  
5 ([Michelle.Lambert@usdoj.gov](mailto:Michelle.Lambert@usdoj.gov)) and Rebcca Cohen ([Rebecca.cohen@usdoj.gov](mailto:Rebecca.cohen@usdoj.gov)) to advise that  
6 Petitioner is filing this motion for a temporary restraining order. That email also contained copies  
7 of the (1) Petition for Writ of Habeas Corpus and Complaint for Injunctive Relief, (2) Motion for  
8 Temporary Restraining Order, (3) Declarations of Jennifer Pasquarella, Tin Thanh Nguyen,  
9 Glenda M. Aldana Madrid, Anita Amantea, and Pierre Williams, and Exhibits in Support of the  
10 Petition and Motion for Temporary Restraining Order, (4) Proposed Order, and (5) Proposed  
11 Summons.

12 Pursuant to Local Court Rule 100(e), the undersigned counsel verify that the facts set  
13 forth therein are true and correct to the best of my knowledge. I make this verification on behalf  
14 of Petitioner Phong Thanh Ngyuen, who is unable to make this verification himself while he is  
15 detained at the Northwest Immigration and Customs Enforcement Processing Center in Tacoma,  
16 Washington.

17 Respectfully submitted,

18 DATED: July 24, 2025

19 /s/ Jennifer Pasquarella

20 Jennifer Pasquarella (WA Bar No. 62205)  
21 Seattle Clemency Project  
22 20415 72nd Ave South, Suite 1-415  
23 Kent, WA 98032  
24 Telephone: 206.682.1114  
25 jennie@seattleclemencyproject.org  
26

NOTICE OF MOTION OF TRO - 2

1 STOEL RIVES LLP

2 /s/ Tiffany Wang

3 Tiffany Wang, WSBA No. 57367

4 600 University Street, Suite 3600

5 Seattle, WA 98101

6 Telephone: 206.624.0900

7 tiffany.wang@stoel.com

8 *Attorneys for Petitioner*

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NOTICE OF MOTION OF TRO - 3  
Case No. 2:25-cv-01398

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