

The Honorable Grady J Leupold

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FERNANDO LEDESMA GONZALEZ,

Petitioner,

v.

DREW BOSTICK, et al.,

Respondents.

No. 2:25-cv-01404-JNW-GJL

MOTION FOR LEAVE TO FILE
OVERLENGTH RESPONSE

Noting Calendar Date: September 19,
2025

Petitioner, through undersigned counsel, moves this Honorable Court for leave to file an overlength Response in Support of the Amended Petition for Writ of Habeas Corpus. In support of this Motion, counsel states as follows:

1. This is a habeas action under 28 U.S.C. § 2241. Petitioner was arrested during a routine ICE check-in, despite previously being found suitable for release, and has been detained for nearly three months. His Petition for Writ of Habeas Corpus challenges his detention under the Due Process Clause of the Fifth Amendment and the Administrative Procedure Act (APA). ECF 1.

2. The Respondents filed a return contending that Petitioner is a flight risk and his detention is not violative of due process or the APA. ECF 29.

3. Undersigned counsel has prepared a Response in Support of the Petition addressing the facts surrounding his release and his re-detention, the relevant regulatory framework, and the legal basis for his Due Process and APA claims. Counsel has made a good-faith effort to present these issues concisely, but is unable to do so within the word limits of Local Rule 7(e)(3).

