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Dabona Tang
A#025-294-674
Northwest Detention Center
1623 East J Street
Tacoma, WA 98421-1615

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DABONA TANG,
Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; DREW BOSTOCK,
Seattle Field Office Director, United States
Citizenship and Immigration Services;
WARDEN of Immigration Detention
Facility; and the United States Immigration
and Customs Enforcement,
Respondents.

NO. C

REQUEST FOR APPOINTMENT OF
COUNSEL

Petitioner Dabona Tang hereby requests that the Court appoint the office of the Federal Public Defender for the Western District of Washington, or such other counsel as the Court may deem appropriate, to represent him in this matter. Petitioner does not have the financial resources to retain counsel as he is presently in custody. For these reasons, and because the present petition presents novel and complex issues of law, appointment of counsel would serve the interests of justice. Many other ICE detainees are or will be raising similar habeas challenges against respondents, and this Court will


FEDERAL PUBLIC DEFENDER
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(206) 553-1100

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benefit from the contributions of experienced, federal counsel in examining these claims. In addition, if an evidentiary hearing is necessary in this case, petitioner will need the assistance of counsel for such a hearing.

DATED this 28 day of July, 2025.

Respectfully submitted,


_____[SIGN NAME]
Dabona Tang
A 025-294-674
Northwest Detention Center
1623 East J Street
Tacoma, WA 98421-1615

FEDERAL PUBLIC DEFENDER
Western District of Washington

Colin Fieman
Federal Public Defender

Corey Endo
First Assistant Defender

August 5, 2025

The Honorable Magistrate Judge
U.S. Courthouse
700 Stewart Street
Seattle, WA 98101

Re: *Dabona Tang*, A# 025294675

Dear Magistrate Judge:

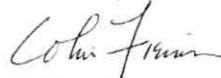
We have conducted an initial review of Dabona Tang's habeas corpus petition. It appears his case falls within the group of petitions challenging the statutory authority of the ICE to detain him pursuant to *Zadvydas v. Davis*, 533 U.S. 678 (2001). Mr. Tang also challenges the constitutionality of his detention by ICE and the lawfulness of his rearrest while on supervision.

As Mr. Tang has set forth in his habeas petition, his case is controlled by *Zadvydas v. Davis*, 533 U.S. 678 (2001). Mr. Tang was ordered deported to Vietnam on February 17, 2011. He spent six months in immigration custody before being released on supervision, and then complied with the terms of his supervision for more than a decade before his rearrest on May 21, 2025. It appears there has been no change in the likelihood that Mr. Tang can be removed from the United States.

Based on these facts, our office believes that ICE does not have the statutory or constitutional authority to detain Mr. Tang.

Should Mr. Tang qualify financially, we welcome the opportunity to assist him in pursuing his claims for relief. Thank you.

Sincerely,



Colin Fieman
Federal Public Defender