



**TO THE HONORABLE JUDGE RICHARD A. JONES and  
MAGISTRATE JUDGE S. KATE VAUGHAN:**

Petitioner, **Javier Zendejas Vasquez**, appearing **pro se**, respectfully submits this **Motion to Expedite** pursuant to the Court's inherent authority and the urgent liberty interests at stake in this immigration habeas matter under **28 U.S.C. § 2241**.

**I. BACKGROUND:**

1. Petitioner is a civil immigration detainee currently held at **Northwest ICE Processing Center (NWDC)** in Tacoma, Washington, located at:

1623 E. J Street   
Tacoma, WA 98421-1615

2. Petitioner has been in continuous ICE detention since **December 23, 2023**, and has now been confined extremely; over **nine (9) months** without a bond hearing or meaningful opportunity to challenge the necessity of his detention.
3. On August 19<sup>th</sup>, 2025, Petitioner filed a **Petition for Writ of Habeas Corpus** (Dkt.) under **28 U.S.C. § 2241**, challenging the legality and constitutionality of his prolonged detention, including violations of his rights under the **Due Process Clause of the Fifth Amendment**.

**II. LEGAL STANDARD**

4. Habeas corpus petitions are entitled to **expedited review** due to the urgent liberty interests at stake. See *Preiser v. Rodriguez*, 411 U.S. 475, 485 (1973); *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

5. Courts have the **inherent power to expedite proceedings** where necessary to prevent irreparable harm and ensure timely administration of justice. See *Clinton v. Jones*, 520 U.S. 681, 706 (1997).

### III. REASONS TO EXPEDITE

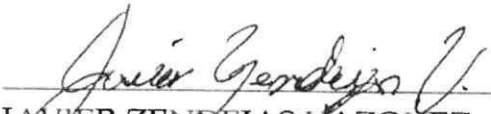

6. Petitioner has been detained for over **nine months** without a bond hearing, despite having no final removal order and no individualized finding of dangerousness or flight risk.
7. This ongoing detention constitutes **irreparable harm**, as each day Petitioner remains in custody without due process exacerbates the deprivation of liberty.
8. Petitioner requests prompt review of his habeas claims and an **expedited briefing schedule**, as the government is presumed to have immediate access to the relevant records.
9. Expedited review will not prejudice Respondents and is consistent with the priorities of habeas corpus jurisprudence.

### IV. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that the Court:

1. **GRANT this Motion to Expedite;**
2. **ORDER Respondents to file a response** to the habeas petition within **3-5 days** of the Court's order;
3. **SET an expedited briefing schedule or hearing date**, if necessary; and
4. Grant such other and further relief as the Court deems just and proper.

Signed date: September 26<sup>th</sup>, 2025  
Respectfully submitted

  
\_\_\_\_\_  
JAVIER ZENDEJAS VASQUEZ  
1623 E. J Street,   
Tacoma, WA 98421

Zendejas Vasquez v. Lyons et al  
Assigned to: Judge Richard A. Jones  
Referred to: Hon. S. Kate Vaughan  
Cause: 28:2241 Petition for Writ of Habeas Corpus  
(federal)

Date Filed: 08/19/2025  
Jury Demand: None  
Nature of Suit: 463 Habeas Corpus -  
Alien Detainee  
Jurisdiction: U.S. Government  
Defendant.

Petitioner

Javier Zendejas Vasquez

represented by

**Javier Zendejas Vasquez**

  
NW DETENTION CENTER  
1623 E. J STREET,   
TACOMA, WA 98421-1615  
PRO SE

V.

Respondent

**Todd Lyons**  
*Field Office Director for Detention and  
Removal, United States Immigration  
and Customs Enforcement*

represented by

**US Attorney Habeas**  
Email: usawaw.Habeas@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Respondent

**United States Department of  
Homeland Security**

represented by

**US Attorney Habeas**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Respondent

**Warden**  
*Northwest Detention Center, Tacoma  
WA*

represented by

**US Attorney Habeas**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
(SEATTLE)

ZENDEJAS-VAZQUEZ JAVIER  
Plaintiff or Petitioner.

*versus.*

TODD LYONS, et al.,  
Respondent or Defendant.

Case File No. : 2:25-cv-01609-RAJ-SKV

**(PROPOSED) ORDER GRANTING MOTION TO EXPEDITE**

This matter comes before the Court on Petitioner Javier Zendejas Vasquez's **Motion to Expedite** proceedings in connection with his **Petition for Writ of Habeas Corpus** filed pursuant to 28 U.S.C. § 2241.

Having reviewed the motion and the record in this case, and good cause appearing:

**IT IS HEREBY ORDERED THAT:**

1. **Petitioner's Motion to Expedite is GRANTED;**
2. **Respondents shall file a response** to the Petition for Writ of Habeas Corpus **within ten (10) days** of the date of this Order;
3. Any reply by Petitioner may be filed within **seven (7) days** after service of the government's response;
4. The Court will review the matter upon completion of the briefing or may schedule a hearing if deemed necessary.

**IT IS SO ORDERED.**

Dated this \_\_\_ day of \_\_\_\_\_, 2025.

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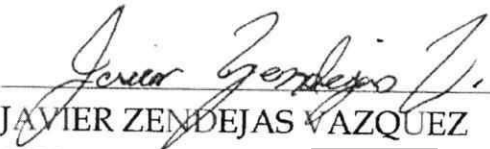

**Hon. S. Kate Vaughan**  
United States Magistrate Judge  
(Western District of Washington)

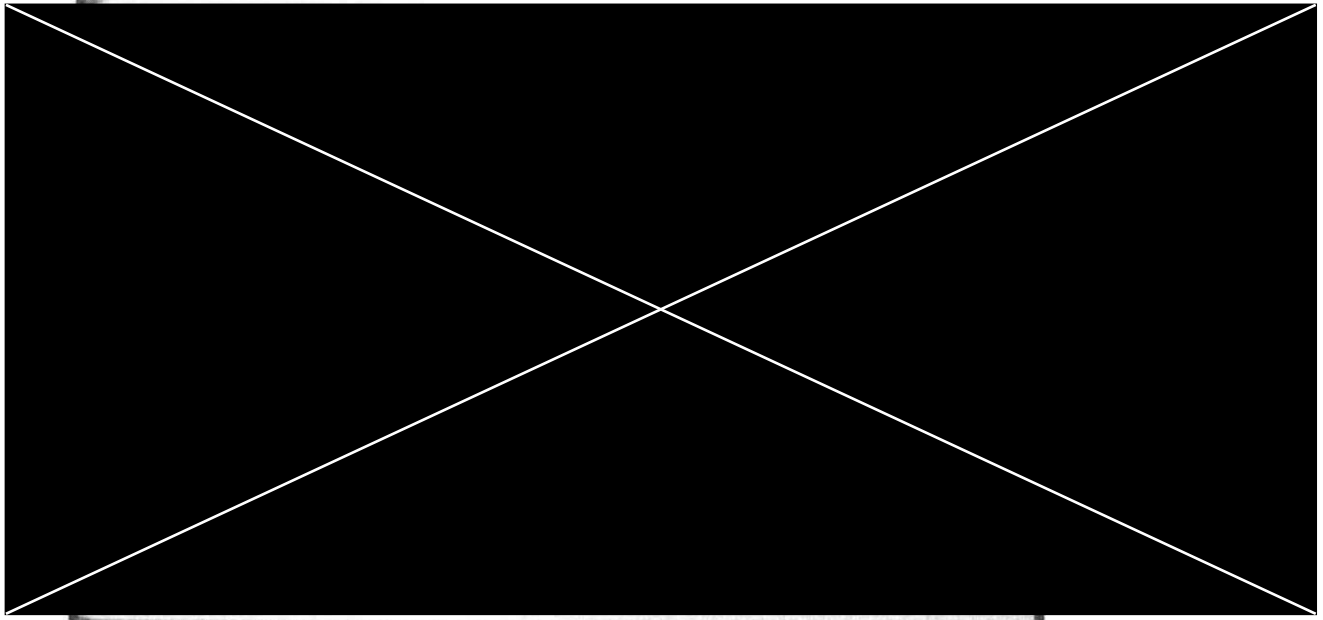
**CERTIFICATE OF SERVICE**

I certify that on this 26<sup>th</sup> day of September 2025, I served a true and correct copy of this Motion to Expedite on the following by U.S. Mail or as otherwise permitted by law:

**Office of the United States Attorney**  
Western District of Washington  
700 Stewart Street, Suite 5220  
Seattle, WA 98101

Signed date: September 26<sup>th</sup> 2025  
Respectfully submitted

  
\_\_\_\_\_  
JAVIER ZENDEJAS VAZQUEZ  
1623 E. J Street, Suite   
Tacoma, WA 98421



**UNITED STATES DISTRICT COURT**  
Western District of Washington

Javier Zendejas Vasquez

Petitioner  
vs.

Todd Lyons et al

Respondent(s)

Case Number: 2:25-cv-01609-RAJ-SKV

**DECLARATION AND APPLICATION  
TO PROCEED IN FORMA PAUPERIS  
IN A FEDERAL HABEAS ACTION**

**DO NOT use this form if you are bringing a  
civil action.**

**DECLARATION AND APPLICATION TO PROCEED IN FORMA PAUPERIS**

I (print your name) Javier Zendejas Vasquez declare I am the petitioner in this habeas proceeding; I believe I am entitled to relief; and I am unable to pay the costs of this proceeding or give security thereof.

FILED  
LODGED  
RECEIVED  
**MAIL**

This action proceeds pursuant to: 28 U.S.C.  §2241  §2254  §2255

OCT 01 2025

In support of this application, I answer *all* of the following questions:

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

1. Are you presently employed?

Yes Total amount of net monthly salary (take home pay) \$ ~~XXXXXXXXXX~~  
Name and address of employer N/A

No Date of last employment ~~XXXXXXXXXX~~  
Amount of net monthly salary ~~XXXXXXXXXX~~

2. For the past twelve months, list the amount of money you have received from any of the following sources.

- a. Business, profession or other self-employment \$ ~~XXXXXXXXXX~~
- b. Income from rent, interest or dividends \$ ~~XXXXXXXXXX~~
- c. Pensions, annuities or life insurance payments \$ ~~XXXXXXXXXX~~
- d. Disability, unemployment, workers compensation or public assistance \$ ~~XXXXXXXXXX~~
- e. Gifts or inheritances \$ ~~XXXXXXXXXX~~
- f. Money received from child support or alimony \$ ~~XXXXXXXXXX~~
- g. Describe any other source of income N/A \$ ~~XXXXXXXXXX~~

3. List the amount for each of the following (include prison account funds) :

Cash on hand \$



4. Do you own or have any interest in any real estate, stocks, bonds, notes, retirement plans, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)?

If Yes, describe the property and state its approximate value:

Yes  No [Redacted]

\$ [Redacted]

5. Are any persons dependent upon you for support? If Yes, state their relationship to you, and how much you contribute toward their support each month. (Do not include names of minor children)

Yes  No [Redacted]

\$ [Redacted]

6. Describe the types of monthly expenses you incur, such as housing, transportation, utilities, food, or other regular monthly expenses and the amount spent each month.

None [Redacted]

\$ [Redacted]

7. Provide any other information that will help explain why you cannot pay court fees and costs

I am currently being held as a detainee PRISONER, A DETAINEE, A PRISONER INMATE at the Northwest Detention Center, located at: 1623 E. J Street, Suite 5, Tacoma, WA 98421.

I declare under penalty of perjury that the foregoing is true and correct.

*Javier Zendejas V.*

9/26/25

Executed on: (Date)

*Javier Zendejas Vazquez*  
Signature of Applicant

**CERTIFICATION**

Have the institution fill out the Certification portion of this application and attach a certified copy of your prison trust account statement showing transactions for the past six months.

I certify that the applicant named herein has the sum of \$ 0.00 on account to his/her credit at

(Name of Institution) None

N/A

Executed on: (Date)

Signature of Financial Officer