

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

THE HONORABLE _____

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Chittakone Phetsadakone

Petitioner,

v.

Bruce SCOTT, Warden, Northwest ICE Processing Center; Cammilla WAMSLEY, 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. 25-cv-01678

**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 Chittakone Phetsadakone hereby requests that the Court issue a temporary restraining order directing Respondents to immediately release Petitioner from the Northwest Immigration and Customs Enforcement Processing Center in Tacoma, Washington; enjoin Respondents from removing him to any country pending the resolution of his pending writ of *corum nobis*, filed concurrently today in Case No. 96-cr-00616-RSL-1 and motion to reopen immigration proceedings; and enjoin Respondents from removing or attempting to remove Petitioner to a third

NOTICE OF MOTION FOR TRO

1 country in violation of the Constitution and statutory procedures pending the resolution of the
2 Petition for Writ of Habeas Corpus. This motion is supported by the following Memorandum of
3 Points and Authorities, and by his Petition for Writ of Habeas Corpus and supporting exhibits,
4 dated August 29, 2025.

5 Undersigned counsel hereby declares and certifies that on August 29, 2025, immediately
6 after filing this motion with the Court, she emailed Michelle Lambert
7 (Michelle.Lambert@usdoj.gov) and Rebecca Cohen (Rebecca.cohen@usdoj.gov) to advise that
8 Petitioner is filing this motion for a temporary restraining order. That email also contained copies
9 of the (1) Petition for Writ of Habeas Corpus and Complaint for Injunctive Relief, (2) Motion for
10 Temporary Restraining Order, (3) the Declarations and Exhibits in Support of the Petition and
11 Motion for Temporary Restraining Order, (4) Proposed Order, and (5) Proposed Summons.

12 Pursuant to Local Court Rule 100(e), the undersigned counsel verify that the facts set forth
13 therein are true and correct to the best of my knowledge. I make this verification on behalf of
14 Petitioner Chittakone Phetsadakone, 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
18 Dated: August 29, 2025

19 Respectfully submitted,

20 s/ Jennifer Pasquarella
21 JENNIFER PASQUARELLA, WSBA#62205
22 Seattle Clemency Project
23 20415 72nd Ave S
24 Kent, Washington 98032
25 Phone: (917) 690-2038
26 Email: jennie@seattleclemencyproject.org

s/ Mo Hamoudi
MOHAMMAD "MO" ALI HAMOUDI,
WSBA#48512

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Stritmatter Law
3600 15th Avenue West, Ste 300
Seattle, WA 98119
Phone: (206) 448-1777
Email: mo@stritmatter.com

Counsel for Petitioner