

Chief District Judge David G. Estudillo
Magistrate Judge Michelle L. Peterson

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REZA DANESHFAR,

Petitioner,

v.

FACILITY ADMINISTRATOR, Northwest
Immigration and Customs Enforcement
Processing Center, Tacoma Washington,

Respondent.

Case No. 2:25-cv-01708-DGE-MLP

INTERESTED NON-PARTIES'¹
REPLY IN SUPPORT OF RETURN
MEMORANDUM

Noted for Consideration:
December 11, 2025.

Petitioner has not carried his burden under *Zadvydas* to provide good reason to believe there is no significant likelihood of removal in the reasonably foreseeable future. *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Petitioner's response offers no new factual assertions or evidentiary developments that would alter the analysis before the Court.

Accordingly, Respondents rely on, and incorporate by reference, the arguments, authorities, and factual representations set forth in their Return Memorandum and accompanying

¹ For the purposes of this habeas brief, "Interested Non-Parties" refers to the United States of America on behalf of U.S. Immigration and Customs Enforcement ("ICE") Seattle Field Office Director Laura Hermosillo, U.S. Department of Homeland Security ("DHS") Secretary Kristi Noem, DHS, and U.S. Attorney General Pamela Bondi, collectively, "Federal Respondents." Respondent Bruce Scott is not represented by undersigned counsel.

1 declarations and exhibits attached thereto (Dkts. 9, 10, 11). For the reasons stated therein, and
2 because Petitioner has not provided any basis for relief, Interested Non-parties respectfully
3 request the Court deny the Petition.

4 DATED this 11th day of December, 2025.

5 Respectfully submitted,

6 CHARLES NEIL FLOYD
7 United States Attorney

8 *s/ Alexandria K. Morris*
9 ALIXANDRIA K. MORRIS, TX. #24095373
10 Assistant United States Attorney
11 Western District of Washington
12 United States Attorney's Office
13 1201 Pacific Avenue, Suite 700
14 Tacoma, Washington 98402
15 Phone: 253-428-3824
16 Email: alixandria.morris@usdoj.gov

17 *Attorneys for Interested Non-Parties*

18 *I certify that this memorandum contains 107*
19 *words, in compliance with the Local Civil Rules.*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify on today's date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

Bahareh Daneshfar
Email: baharehdaneshfar123@gmail.com

I further certify on today's date, I arranged for service of the foregoing on the following non-CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as follows:

Reza Daneshfar, Pro Se Petitioner
A# 
NW ICE Processing Center
1623 E. J Street, Suite 5
Tacoma, WA 98421-1615

DATED this 11th day of December, 2025.

s/ Hung Nguyen
HUNG NGUYEN, Paralegal Specialist
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, Washington 98101
Phone: 206-553-7970
Fax: 206-553-4067
Email: hung.nguyen@usdoj.gov