

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Daixon Jose RAMIREZ TESARA,

Petitioner,

v.

Camila WAMSLEY, et al.,

Respondents.

Case No.

**DECLARATION OF DOUGLAS
VALLADARES IN SUPPORT OF
PETITIONER'S MOTION FOR A
TEMPORARY RESTRAINING
ORDER OR FINAL RULING ON
PETITION FOR WRIT OF HABEAS
CORPUS**

I, Douglas Valladares, declare as follows:

1. I submit this declaration in support of Petitioner's petition for writ of habeas corpus and motion for a temporary restraining order or final ruling. I am over the age of 18, have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently as set forth below.

2. I am an attorney with CLEAR Clinic, pro hac vice counsel for the Petitioner.

3. Attached as Exhibit A is a true and correct copy of U.S. Department of Homeland Security Form I-860, Notice and Order of Expedited Removal, for Daixon Jose Ramirez Tesara, notice dated January 13, 2024, signed by Border Patrol Agent Javier Gutierrez. CLEAR Clinic

VALLADARES DECL. IN SUPP. OF PETITIONER'S PET.
FOR WRIT OF HABEAS CORPUS - 1

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Avenue Suite 400
Seattle, WA 98104
Tel. (206) 957-8611

obtained this copy of this document from Mr. Ramirez Tesara's partner, Daimarys Jose Suniaga Martinez.

1 4. Attached as Exhibit B is a true and correct copy of U.S. Department of Homeland
2 Security Form I-870, Record of Determination/Credible Fear Worksheet, statement by Daixon
3 Jose Ramirez Tesara, dated January 26, 2024. CLEAR Clinic obtained this copy of this
4 document from Mr. Ramirez Tesara's partner, Daimarys Jose Suniaga Martinez.

5 5. Attached as Exhibit C is a true and correct copy of Form I-862, Department of
6 Homeland Security Notice to Appear, for Daixon Jose Ramirez Tesara, dated February 2, 2024.
7 CLEAR Clinic obtained this copy of this document from Mr. Ramirez Tesara's partner,
8 Daimarys Jose Suniaga Martinez.

9 6. Attached as Exhibit D is a true and correct copy of U.S. Department of Homeland
10 Security Interim Notice Authorizing Parole, for Daixon Jose Ramirez Tesara, dated February 7,
11 2024. CLEAR Clinic obtained this copy of this document from Mr. Ramirez Tesara's partner,
12 Daimarys Jose Suniaga Martinez.

13 7. Attached as Exhibit E is a true and correct copy of the ISAP Enrollment Sheet,
14 undated. CLEAR Clinic obtained this copy of this document from Mr. Ramirez Tesara's partner,
15 Daimarys Jose Suniaga Martinez.

16 8. Attached as Exhibit F is a true and correct copy of U.S. Department of Justice
17 Executive Office for Immigration Review El Paso, Texas Immigration Court Pro Se Motion to
18 Change Venue to Portland, Oregon, dated February 29, 2024. CLEAR Clinic obtained this copy
19 of this document from Mr. Ramirez Tesara's partner, Daimarys Jose Suniaga Martinez.

20 9. Attached as Exhibit G is a true and correct copy of the Automatic Case
21 Information System website print out for U.S. Department of Justice Executive Office for

1 Immigration Review Portland, Oregon Immigration Court Notice of In-Person Hearing, printed
2 on March 11, 2025, for a Master hearing scheduled July 19, 2027 at 8:30 a.m. at Portland,
3 Oregon Immigration Court. CLEAR Clinic obtained this copy of this document from Mr.
4 Ramirez Tesara's partner, Daimarys Jose Suniaga Martinez.

5 10. Attached as Exhibit II is a true and correct copy of Petitioner's I-589 Application
6 for Asylum and for Withholding of Removal, dated October 2, 2024, and showing receipt date of
7 October 4, 2024 by Executive Office of Immigration Review Portland, Oregon Immigration
8 Court. CLEAR Clinic obtained this copy of this document from Mr. Ramirez Tesara's partner,
9 Daimarys Jose Suniaga Martinez.

10 11. Attached as Exhibit I is a true and correct copy of Oregon Health Authority
11 Center for Health Services Certificate of Live Birth, of Daysha Josielys Ramirez Suniaga,
12 daughter of Daixon Jose Ramirez Tesara, signed December 29, 2024 and filed February 11,
13 2025. CLEAR Clinic obtained this copy of this document from Mr. Ramirez Tesara's partner,
14 Daimarys Jose Suniaga Martinez.

15 12. Attached as Exhibit J are true and correct copies of screenshots taken from the
16 Immigration Customs and Enforcement (ICE) Intensive Supervision Appearance Program phone
17 application for Daixon Jose Ramirez Tesara, showing messages sent on or around dated August
18 14, 2025. A Certified Translation dated September 4, 2025 is attached hereto. CLEAR Clinic
19 obtained these screenshots from Mr. Ramirez Tesara's partner, Daimarys Jose Suniaga Martinez.

1 These documents have been marked up pursuant to Local Civil Rule 10(e)(10).

2 I declare under penalty of perjury under the laws of the United States that the foregoing is
3 true and correct.

4 Executed this 5th day of September, 2025, in Portland, Oregon.

5 

Douglas Valladares

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