

Case 2:25-cv-01748

Supplemental Reply

1 NORTHWEST ICE PROCESSING CENTER
1623 EAST J STREET SUITE 5
2 TACOMA, WASHINGTON 98421

3 UNITED STATES DISTRICT COURT

4 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

6 JOSE DAVID LAINEZ BUESO,

7 Petitioner

8 vs.

9 ICE FIELD OFFICE DIRECTOR,

10 Respondent

) Case No.: 2:25-cv-C25-1748-KKE-MLP

) PETITIONER'S SUPPLEMENTAL REPLAY
) TO RESPONDENT'S ARGUMENTS.

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MAIL

APR 17 2026

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

BY DEPUTY

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13 This Petitioner is providing the following supplemental replay to the Respondent's arguments
14 pursuant to the Court's Order:

15 Here, the Petitioner moves this Court to issue an order commanding his release from the custody
16 of ICE due to the fact that such custody violates the due process rights of the Petitioner.

17 FACTUAL UPDATES; SUPPLEMENTAL

- 18 1. This Petitioner wants to **highlight** that all detainee people from this Detention **have the right,**
19 **but only after one year (12 months)** to a medical check up and dental care clean up.
- 20 2. On past March,11; this Petitioner after one year to be requesting for medical care, he finally
21 was referred to a Tacoma Endoscopy Center outside of this facilities for a colonoscopy and
22 endoscopy examination due to a related symptoms with **colon cancer and stomach**
23 **esophageal disease.** Petitioner has been requesting the results of this examination, but the
24 medical staff from this Detention have refused to provide this information which become the
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1 Petitioner very concern, anxious, and anguish due he doesn't know exactly whether this
2 medical staff is holding or hide a serious illnesses that need to act toward urgently.


3 **3.** The Petitioner's health has worsen in this center he has gotten several and serious Illnesses
4 described in the Medical Records, Illnesses that need to be treated urgently in a hospital
5 (Medical Records already in the record) apart from **psychological harm** such as sadness,
6 crying, anxiety, stress, nightmares, lonely, anger, depression etc.

7 **4.** This Petitioner is still in custody of the Attorney General at Tacoma's Northwest Detention
8 Center in Tacoma Washington **since 02/23/2024. Next 23rd of this month is going to be 2**
9 **years two months to be in this prison. "detention"**

10 **5.** If the Court shall check again the criminal records of this petitioner, the Court will find out that
11 petitioner has been in jail no more than for months, in case contrary, this government has held
12 the petitioner for the ongoing period of 26 months now, as whether the petitioner was a serious
13 criminal convicted.

14 **6.** On **September,10,2025** the Western District Court of Washington filed a Petitioner's writ for
15 habeas corpus release.

16 **7.** **Since September,10,2025 to this present day of 2026, the Petitioner's Habeas Corpus**
17 **process HAS REACHED 7 more months**, a significant period of time and this petitioner is
18 still in custody.

19 **8.** Petitioner's liberty interest is high, given that he was denied for release in a bond re-
20 determination hearing last 08/13/2025 when the Judge did not take into consideration that
21 petitioner arrived into the United States in **Lawful Conditions**; B-2 Visitor or Tourist Visa,
22 and C1-D Work Visa, and Passport No.  apart from all other credible evidence that
23 it's already in the record.

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1 **9.** This Petitioner has to inform to this Court and make **emphasis** that here inside of this detention
2 center of NORTHWEST, many people (detainees) have filed their own habeas corpus before
3 this District Court, but when the District Court refers these people to the Immigration Court for
4 a bond hearing, the Immigration Courts continues in violating of the detainees' rights and
5 denying their cases even though they are eligible for a bond.

6 **10.** Petitioner in his Condition of ***Pro-Se***; consider that he was fully capable to present by himself
7 before the court the sufficient EXCULPATORY evidence to SUCCEED ON THE MERITS
8 for his Detention's RELEASE and respectfully ask to this honorable Court **does not refer this**
9 Petitioner to a second bond hearing due to **item 9** described above and ask to this District Court
10 to do substantial **JUSTICE** by granting the Petitioner's habeas petition by your own.

11 **11.** This Petitioner is grateful and appreciate the efforts made by this District Court trying to search
12 an appointment of counsel to this petitioner, and respectfully ask at the same time, please value
13 the Petitioner's efforts made in the development of all arguments presented before to this
14 Honorable District Court of Seattle in his condition of ***Pro-Se***.

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VERIFICATION

I, Jose David Lainez Bueso, do hereby aver that the words above are the truth and the entire truth, that I will testify to those facts under penalty of perjury and I provide this information based upon personal belief that they are the facts of this matter, except where stated on personal belief. Submitted under the penalty of perjury of the laws of the United States.

Dated this: 04/13/2026

Signed: 

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PROOF OF SERVICE

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DECLARATION

I, Jose David Lainez Bueso, AVER THAT I AM A PARTY TO THIS ACTION DO HEREBY AVER THAT I HAVE PROVIDED A COPY OF THE FOREGOING DOCUMENT:

PETITION FOR WRIT OF HABEAS CORPUS/ SUPPLEMENTAL REPLY

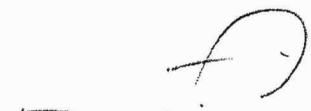
Kristin B. Johnson, WSBA #28189
Assistant United States Attorney
United States Attorney's Office
700 Stewart St, Suite 5220
Seattle, WA 98101-1271

CLERK, U.S. DISTRICT COURT
U.S. Courthouse
700 Stewart Street, Suite 2310
SEATTLE, WASHINGTON 98101-1271

I WILL TESTIFY UNDER THE PENALTY OF PERJURY THAT THIS IS THE TRUTH.

THE ITEMS WERE MAILED FIRST CLASS MAIL ON THE DATE BELOW.

SUBMITTED ON 04/13/2026

Signed: 

Jose David Hernandez Borero (Pro-Se)
Case No. 2:25-cv-01748-KKE
Northwest Ice Processing Center
1623 East J. Street, Suite 5
Tacoma, WA 98421

TACOMA WA 983

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