

THE HONORABLE RICARDO S. MARTINEZ
THE HONORABLE S. KATE VAUGHAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

7 ARTIN HAMBARSONPOUR, 8 Petitioner, 9 v. 10 PAMELA BONDI; <i>et al.</i> , 11 Respondents.) No. 25-cv-1802-RSM-SKV)) STIPULATION REGARDING THIRD-) COUNTRY REMOVAL)) Noted for Consideration: October 6, 2025
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Petitioner Artin Hambarsonpour has filed a habeas corpus petition challenging his detention at the Northwest ICE Processing Center. Dkt. 1. In that Petition, he seeks an order preventing his removal to a country other than France, absent notice and meaningful opportunity to respond in compliance with the statute and due process in reopened removal proceedings. *Id* at 16. The parties have conferred, and U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) is not seeking to effectuate Petitioner’s removal to a third country.

Therefore, ICE ERO agrees that, while this case is pending, it will not remove Petitioner to any country other than France.

DATED this 6th day of October 2025.

Respectfully submitted,

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8 I certify this document contains 106 words in compliance with the Local Civil Rules.

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[PROPOSED] ORDER

For so long as this case remains pending, ICE ERO shall not remove Petitioner Artin Hambarsonpour to any country other than France.

It is so ORDERED.

Dated this ___ day of October 2025.

RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Alan Zarky
Staff Attorney
Attorney for Petitioner

/s/ Michelle R. Lambert
Assistant United States Attorney
Attorney for Federal Respondents