The Honorable Kymberly K. Evanson
The Honorable Grady J. Leupold

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

ADAN STEVEN BOJORGE-SEQUEIRA, Petitioner, v. GEO GROUP, INC., NORTHWEST ICE PROCESSING CENTER, and U.S. DEPARTMENT OF HOMELAND SECURITY, Respondents.	Case No. 2:25-cv-01807-KKE-GJL FEDERAL RESPONDENTS' RETURN MEMORANDUM Noted for Consideration: November 17, 2025

This Court should deny Petitioner Adan Steven Bojorge-Sequeira's habeas petition. Dkt. 1. Petitioner contends his detention is unconstitutional under *Zadvydas v. Davis*, 533 U.S. 678 (2001). *Zadvydas* is inapplicable because Petitioner does not have a final order of removal. Instead, Petitioner is detained under 8 U.S.C. § 1225(b). Using the correct standard for cases under that authority, Petitioner's detention has not become unduly prolonged as to merit relief. Even if Petitioner were entitled to relief on his petition, it would be to a bond redetermination hearing, not release.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

I. LEGAL BACKGROUND

A. Applicants for Admission

Petitioner contends the Board of Immigration Appeals recently changed its interpretation of the term "applicant for admission" to apply to him and therefore, denied him bond for lack of jurisdiction. Dkt. 1, pp. 2, 3. "The phrase 'applicant for admission' is a term of art denoting a particular legal status." *Torres v. Barr*, 976 F.3d 918, 927 (9th Cir. 2020) (en banc). Section 1225(a)(1) states:

> (1) Aliens treated as applicants for admission. – An alien present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of arrival …) shall be deemed for the purposes of this Act an applicant for admission.

8 U.S.C. § 1225(a)(1).[1] Section 1225(a)(1) was added to the INA as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 ("IIRIRA"). Pub. L. No. 104-208, § 302, 110 Stat. 3009-546. "The distinction between an alien who has effected an entry into the United States and one who has never entered runs throughout immigration law." *Zadvydas* 533 U.S. at 693.

Before IIRIRA, "immigration law provided for two types of removal proceedings: deportation hearings and exclusion hearings." *Hose v. I.N.S.*, 180 F.3d 992, 994 (9th Cir. 1999) (en banc). A deportation hearing was a proceeding against a noncitizen already physically present in the United States, whereas an exclusion hearing was against a noncitizen outside of the United States seeking admission. *Id.* (quoting *Landon v. Plasencia*, 459 U.S. 21, 25 (1982)). Whether an applicant was eligible for "admission" was determined only in exclusion proceedings, and exclusion proceedings were limited to "entering" noncitizens – those noncitizens "coming ... into the United States, from a foreign port or place or from an outlying

[1] Admission is the "lawful entry of an alien into the United States after inspection and authorization by an immigration officer." 8 U.S.C. § 1101(a)(13).

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

possession." *Plasencia*, 459 U.S. at 24 n.3 (quoting 8 U.S.C. § 1101(a)(13) (1982)). "[N]on-citizens who had entered without inspection could take advantage of greater procedural and substantive rights afforded in deportation proceedings, while noncitizens who presented themselves at a port of entry for inspection were subjected to more summary exclusion proceedings." *Hing Sum v. Holder*, 602 F.3d 1092, 1100 (9th Cir. 2010); *see also Plasencia*, 459 U.S. at 25-26. Prior to IIRIRA, noncitizens who attempted to lawfully enter the United States were in a worse position than noncitizens who crossed the border unlawfully. *See Hing Sum*, 602 F.3d at 1100; *see also* H.R. Rep. No. 104-469, pt. 1, at 225-229 (1996). IIRIRA "replaced deportation and exclusion proceedings with a general removal proceeding." *Hing Sum*, 602 F.3d at 1100.

IIRIRA added Section 1225(a)(1) to "ensure[] that all immigrants who have not been lawfully admitted, regardless of their physical presence in the country, are placed on equal footing in removal proceedings under the INA." *Torres*, 976 F.3d at 928; *see also* H.R. Rep. 104-469, pt. 1, at 225 (explaining that Section 1225(a)(1) replaced "certain aspects of the current 'entry doctrine,'" under which noncitizens who entered the United States without inspection gained equities and privileges in immigration proceedings unavailable to aliens who presented themselves for inspection at a port of entry). The provision "places some physically-but not-lawfully present noncitizens into a fictive legal status for purposes of removal proceedings." *Torres*, 976 F.3d at 928.

B. Detention Under 8 U.S.C. § 1225

Congress established the expedited removal process in 8 U.S.C. § 1225 to ensure that the Executive could "expedite removal of aliens lacking a legal basis to remain in the United States." *Kucana v. Holder*, 558 U.S. 233, 249 (2010); *see also Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 106 (2020) ("[Congress] crafted a system for weeding out patently meritless

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

claims and expeditiously removing the aliens making such claims from the country."). Section 1225 applies to "applicants for admission" to the United States, who are defined as "alien[s] present in the United States who [have] not been admitted" or noncitizens "who arrive[ ] in the United States," whether or not at a designated port of arrival. 8 U.S.C. § 1225(a)(1). Applicants for admission "fall into one of two categories, those covered by § 1225(b)(1) and those covered by § 1225(b)(2)," both of which are subject to mandatory detention. *Jennings*, 583 U.S. at 287.

1. Section 1225(b)(1)

Section 1225(b)(1) applies to "arriving aliens" and "certain other" noncitizens "initially determined to be inadmissible due to fraud, misrepresentation, or lack of valid documentation." *Id.*; 8 U.S.C. §§ 1225(b)(1)(A)(i), (iii). Section 1225(b)(1) allows for the expedited removal of any noncitizen "described in" Section 1225(b)(1)(A)(iii)(II), as designated by the Attorney General or Secretary of Homeland Security – that is, any noncitizen not "admitted or paroled into the United States" and "physically present" fewer than two years – who is inadmissible under Section 1182(a)(7) at the time of "inspection." *See* 8 U.S.C. § 1182(a)(7) (categorizing as inadmissible noncitizens without valid entry documents). Whether that happens at a port of entry or after illegal entry is not relevant; what matters is whether, when an officer inspects a noncitizen for admission under Section 1225(a)(3), that noncitizen lacks entry documents and so is subject to Section 1182(a)(7). The Attorney General's or Secretary's authority to "designate" classes of noncitizens as subject to expedited removal is subject to his or her "sole and unreviewable discretion." 8 U.S.C. § 1225(b)(1)(A)(iii); *see also American Immigration Lawyers Ass'n v. Reno*, 199 F.3d 1352 (D.C. Cir. 2000) (upholding the expedited removal statute).

The Secretary (and earlier, the Attorney General) has designated categories of noncitizens for expedited removal under Section 1225(b)(1)(A)(iii) on five occasions; most recently, restoring the expedited removal scope to "the fullest extent authorized by Congress."

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

Designating Aliens for Expedited Removal, 90 Fed. Reg. 8139 (Jan. 24, 2025). The notice thus enables DHS "to place in expedited removal, with limited exceptions, aliens determined to be inadmissible under [8 U.S.C. § 1182(a)(6)(C) or (a)(7)] who have not been admitted or paroled into the United States and who have not affirmatively shown, to the satisfaction of an immigration officer, that they have been physically present in the United States continuously for the two-year period immediately preceding the date of the determination of inadmissibility," who were not otherwise covered by prior designations. *Id.*, at 8139-40.

Expedited removal proceedings under Section 1225(b)(1) include additional procedures if a noncitizen indicates an intention to apply for asylum[2] or expresses a fear of persecution, torture, or return to the noncitizen's country. *See* 8 U.S.C. § 1225(b)(1)(A)(ii); 8 C.F.R. § 235.3(b)(4). If the asylum officer or immigration judge does not find a credible fear, the noncitizen is "removed from the United States without further hearing or review." 8 U.S.C. §§ 1225(b)(1)(B)(iii)(I), (b)(1)(C); 1252(a)(2)(A)(iii), (e)(2); 8 C.F.R. §§ 1003.42(f), 1208.30(g)(2)(iv)(A). If the asylum officer or immigration judge finds a credible fear, the noncitizen is generally placed in full removal proceedings under 8 U.S.C. § 1229a, but remains subject to mandatory detention. *See* 8 C.F.R. § 208.30(f); 8 U.S.C. § 1225(b)(1)(B)(iii)(IV).

Expedited removal under § 1225(b)(1) is a distinct statutory procedure from removal under Section 1229a. Section 1229a governs full removal proceedings initiated by a notice to appear and conducted before an immigration judge, during which the noncitizen may apply for relief or protection. By contrast, expedited removal under Section 1225(b)(1) applies in narrower, statutorily defined circumstances – typically to individuals apprehended at or near the

[2] Noncitizens must apply for asylum within one year of arriving in the United States, 8 U.S.C. § 1558(a)(2)(B), except if the noncitizen can demonstrate "extraordinary circumstances" that justify moving that deadline. *Id.* § 1558(a)(2)(D).

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

border who lack valid entry documents or commit fraud upon entry – and allows for their removal without a hearing before an immigration judge, subject to limited exceptions. For these noncitizens, DHS has discretion to pursue expedited removal under Section 1225(b)(1) or removal under Section 1229a. *Matter of E-R-M- & L-R-M-*, 25 I&N Dec. 520, 524 (BIA 2011).

2. Section 1225(b)(2)

Section 1225(b)(2) is "broader" and "serves as a catchall provision." *Jennings*, 583 U.S. at 287. It "applies to all applicants for admission not covered by § 1225(b)(1)." *Id.* Under Section 1225(b)(2), a noncitizen "who is an applicant for admission" is subject to mandatory detention pending full removal proceedings "if the examining immigration officer determines that [the] alien seeking admission is not clearly and beyond a doubt entitled to be admitted." 8 U.S.C. § 1225(b)(2)(A). While Section 1225 does not provide for noncitizens to be released on bond, DHS has the sole discretionary authority to release any applicant for admission on a "case-by-case basis for urgent humanitarian reasons or significant public benefit." *Id.* § 1182(d)(5)(A); *see Biden v. Texas*, 597 U.S. 785, 806 (2022).

C. Detention Under 8 U.S.C. § 1226(a)

Section 1226(a) provides for the arrest and detention of noncitizens "pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a). Under Section 1226(a), DHS may, in its discretion, detain a noncitizen during his removal proceedings, release him on bond, or release him on conditional parole.[3] By regulation, immigration officers can release a noncitizen if he demonstrates that he "would not pose a danger to property or persons" and "is likely to appear for any future proceeding." 8 C.F.R. § 236.1(c)(8). A noncitizen

[3] Being "conditionally paroled under the authority of § 1226(a)" is distinct from being "paroled into the United States under the authority of § 1182(d)(5)(A)." *Ortega-Cervantes v. Gonzales*, 501 F.3d 1111, 1116 (9th Cir. 2007) (holding that because release on "conditional parole" under § 1226(a) is not a parole, the alien was not eligible for adjustment of status under § 1255(a)).

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

can also request a custody redetermination (i.e., a bond hearing) by an immigration judge at any time before a final order of removal is issued. *See* 8 U.S.C. § 1226(a); 8 C.F.R. §§ 236.1(d)(1), 1236.1(d)(1), 1003.19.

II. FACTUAL BACKGROUND

Petitioner is a native and citizen of Nicaragua. Delgado Decl., ¶ 3. Petitioner entered the United States on or about May 9, 2021, near Hidalgo, Texas and was apprehended by the U.S. Border Patrol at that time. *Id.* The U.S. Border Patrol determined that Petitioner was inadmissible to the United States and issued a Form I-860, Notice and Order of Expedited Removal. *Id.*; Strong Decl., Ex. 1. Petitioner claimed fear of returning to Nicaragua at that time. *Id.*

On June 10, 2021, the U.S. Border Patrol released Petitioner on parole pending an interview by an Asylum Officer with the United States Immigration and Citizenship Services ("USCIS"). *Id.*, ¶ 4; Dkt. 1-1, Ex. C. Petitioner subsequently filed a Form I-589, an application for asylum and related relief, with USCIS on August 8, 2022. *Id.*, ¶ 5. On July 21, 2025, USCIS dismissed Petitioner's I-589 due to lack of jurisdiction and it was referred to the immigration court for review in immigration proceedings under INA § 240. *Id.*, ¶ 6. USCIS issued Petitioner a Notice to Appear ("NTA") charging him with inadmissibility under INA §§ 212(a)(7)(A)(i)(I) and 212(a)(6)(A)(i) of the INA. *Id.*, ¶¶ 6-7; Strong Decl., Ex. 2.

On August 8, 2025, Petitioner was arrested in Bethpage, New York and taken into ICE custody. *Id.*, ¶ 8. He was then transferred to the Northwest ICE Processing Center ("NWIPC") in Tacoma, Washington. *Id.* Petitioner was denied bond on August 25, 2025. Dkt. 1-1, Ex. A. On October 10, 2025, Petitioner appeared before the Tacoma Immigration Court for a merits hearing on his I-589. *Id.*, ¶ 9. At the conclusion of the hearing, the immigration judge denied Petitioner's I-589 and ordered him removed to Nicaragua. *Id.*; Strong Decl., Ex. 3. Petitioner reserved his

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

right to appeal the decision with a deadline of November 10, 2025. *Id.* Petitioner remains detained in ICE custody at the NWIPC. *Id.*, ¶ 10.

III. ARGUMENT

The INA, 8 U.S.C. § 1101 *et seq.*, entrusts the Executive branch to remove inadmissible and deportable noncitizens and to ensure that noncitizens who are removable are in fact removed from the United States. "[D]etention necessarily serves the purpose of preventing deportable [] aliens from fleeing prior to or during their removal proceedings, thus increasing the chance that if ordered removed, the aliens will be successfully removed." *Demore v. Kim*, 538 U.S. 510, 528 (2003). Congress intended for all applicants for admission to be detained during the course of their removal proceedings. *Jennings v. Rodriguez*, 583 U.S. 281, 299 (2018) (interpreting the "plain meaning" of sections 1225(b)(1) and (2) to mean that applicants for admission be mandatorily detained for the duration of their immigration proceedings).

A. Petitioner is an "applicant for admission" subject to mandatory detention

Petitioner's argument rests on his allegation that INA § 236(a) authorizes his detention, *see* Dkt. 1, p. 6, but Petitioner should properly be considered detained under 8 U.S.C. § 1225(b). Section 1225(b)(2)(A) requires mandatory detention of "an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted[.]" 8 U.S.C. § 1225(b)(2)(A). The INA specifies that "[a]n alien present in the United States who has not been admitted … shall be deemed for purposes of this Act an applicant for admission." 8 U.S.C. § 1225(a)(1). Petitioner does not dispute that he is a noncitizen who is present in the United States who has not been

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

admitted. Dkt. 1, p. 3. Thus, Petitioner is an "applicant for admission" and thus subject to mandatory detention under Section 1225(b)(2).[4]

B. Petitioner's conclusory argument about longstanding Immigration Court practice carries little weight

Petitioner argues in conclusory fashion that the BIA's holding of who is an "applicant for admission" violates "long standing Immigration Court practice." Dkt. 1, p. 2. Any argument that prior agency practice applying Section 1226(a) to applicants for admission is unavailing because it is the plain language of the statute and not prior practice that controls. The Supreme Court recognized that courts often change precedents and "correct[] our own mistakes." *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 411 (2024) (overturning *Chevron, U.S.A., Inc. v. Nat. Res. Def. Council, Inc.*, 467 U.S. 837 (1984)). *Loper Bright* overturned a decades-old agency interpretation of the Magnuson-Stevens Fishery Conservation and Management Act that itself predated IIRIRA by twenty years. *Loper Bright*, 603 U.S. at 380. Therefore, longstanding agency practice carries little, if any, weight. The weight given to agency interpretations "must always 'depend upon their thoroughness, the validity of their reasoning, the consistency with earlier and later pronouncements, and all those factors which give them power to persuade.'" *Loper Bright*, 603 U.S. at 432–33 (quoting *Skidmore v. Swift Co.*, 323 U.S. 134, 140 (1944) (cleaned up)).

Whereas Petitioner does not cite why any past Immigration Court practice should control, the BIA's recent precedent decision in *Matter of Yajure-Hurtado* provides the kind of thorough reasoning to show why 8 U.S.C. § 1225(b) should control. In *Yajure*, the BIA analyzed the

[4] Federal Respondents recognize that a court in this District recently issued an order finding that mandatory detention pursuant to 8 U.S.C. § 1225(b) is unlawful for a certified class that were denied bond while detained at the NWIPC. *Rodriguez Vazquez v. Bostock*, No. 25-5240-TMC, -- F. Supp. 3d --, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025). The relevant class is defined as "all noncitizens without lawful status detained at the Northwest ICE Processing Center who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing." *Id.*, at *27. Here, Petitioner is not a member of the class because he was apprehended upon arrival. Delgado Decl., ¶ 3.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

statutory text and legislative history. 29 I. & N. Dec. at 223-25. It highlighted congressional intent that noncitizens present without inspection be considered "seeking admission." *Id.*, at 224. The BIA concluded that rewarding noncitizens who entered unlawfully with bond hearings while subjecting those presenting themselves at the border to mandatory detention would be an "incongruous result" unsupported by the plain language "or any reasonable interpretation of the INA." *Id.*, at 228. To be sure, "when the best reading of the statute is that it delegates discretionary authority to an agency," the Court must "independently interpret the statute and effectuate the will of Congress." *Loper* Bright, 603 U.S. at 395. But "read most naturally, §§ 1225(b)(1) and (b)(2) mandate detention for applicants for admission until certain proceedings have concluded." *Jennings*, 583 U.S. at 297 (cleaned up). Prior practice does not support a position other than Petitioner's detention is mandated by Section 1225(b)(2).

C. Petitioner's detention has not become prolonged under the appropriate standard

Petitioner argues that his detention has become indefinite citing *Zadvydas*, but that case is inapplicable. *Zadvydas* concerned 8 U.S.C. § 1231(a)(6), which applies to noncitizens with final orders of removal.[5] *Jennings*, 583 U.S. at 298. The Supreme Court rejected the Ninth Circuit's rule applying the six-month presumption from *Zadvydas* to cases arising under 8 U.S.C. § 1225(b). *Id.* The Supreme Court further held Section 1225(b) mandates detention during the pendency of removal proceedings and provides no entitlement to a bond hearing. *Id.* at 303 ("Nothing in the statutory text imposes any limit on the length of detention."). The Supreme Court also clarified that Section 1225(b) detainees may be released only through discretionary parole under 8 U.S.C. § 1182(d)(5). *Id.* at 300.

[5] Although an immigration judge has ordered Petitioner removed to Nicaragua, that order is not administratively final. Delgado Decl., ¶ 9.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

The Supreme Court in *Jennings*, however, did not reach the issue of whether prolonged detention without such a hearing could, in individual cases, raise a due process concern. Instead, courts assess whether the detention has become unreasonably prolonged under due process balancing factors. *See Banda v. McAleenan*, 385 F. Supp. 3d 1099, 1117-118 (W.D. Wash. 2019). In *Banda*, the district court found that the petitioner's 17-month immigration detention pursuant to 8 U.S.C. § 1225(b) had become unreasonable. *Id.*, at 1117-121. To conduct this analysis, the court analyzed six factors: (1) length of detention; (2) how long detention is likely to continue absent judicial intervention; (3) conditions of detention; (4) the nature and extent of any delays in the removal caused by the petitioner; (5) the nature and extent of any delays caused by the government; and (6) the likelihood that the final proceedings will culminate in a final order of removal. *See id.* An analysis of these factors demonstrates that Petitioner's detention has not become unreasonable.

First, the length of Petitioner's detention is less than three months. Delgado Decl., ¶ 8. The current length of his detention has not reached the length of what many courts have found to be unreasonable. *See Hong v. Mayorkas*, No. 20-1784, 2021 WL 8016749, at *5 (W.D. Wash. June 8, 2021), *report and recommendation adopted*, 2022 WL 1078627 (W.D. Wash. Apr. 11, 2022) (collecting cases finding prolonged detention from 13 months to 32 months to have become unreasonable). Therefore, this factor should favor Federal Respondents.

Concerning the second *Banda* factor, an immigration judge ordered Petitioner's removal on October 10, 2025. Delgado Decl., ¶ 9. While Petitioner has reserved appeal for that removal order, no appeal has yet been filed. *Id.* If that appeal is not filed, then his removal will become administratively final and Federal Respondents could effect his removal to Nicaragua. If he does file an appeal, it would be speculative to assume that his continued detention will be prolonged while that appeal is pending. Therefore, this factor is at worst neutral.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

As for the third *Banda* factor, Petitioner is detained at the NWIPC. Petitioner has not alleged facts concerning those conditions, so this factor is neutral.

The fourth and fifth *Banda* factors assess delays caused by the petitioner and by the government, respectively. Neither party has delayed Petitioner's removal proceedings. Indeed, an immigration judge ordered Petitioner removed after he filed this habeas petition on October 10, 2025. Delgado Decl., ¶ 9. Therefore, the fourth factor is neutral and the fifth favors Federal Respondents.

The last *Banda* factor weighs the likelihood that removal proceedings will result in a final order of removal. Petitioner acknowledges that he entered the United States without being admitted or paroled. Dkt. 1, pp. 2-3 (acknowledging that the Board of Immigration Appeals' interpretation of "applicant for admission" applies to him). While Petitioner has reserved appeal on his asylum application, it would be speculative to conclude that he will be entitled to relief from removal, and this *Banda* factor should be found accordingly.

Accordingly, this Court should find that Petitioner's continued detention does not violate Due Process.

D. Petitioner is not entitled to release

Petitioner requests release on unspecified "reasonable terms" to pursue his immigration applications. Dkt. 1, p. 7. Although Petitioner's continued detention does not violate due process as discussed above, if the Court were to grant relief, the appropriate relief would be for Petitioner to have a bond redetermination hearing in the immigration court, not release.

IV. CONCLUSION

For the aforementioned reasons, Federal Respondents respectfully request that the Court deny Petitioner's habeas petition.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

DATED this 20th day of October, 2025.

Respectfully submitted,

CHARLES NEIL FLOYD
United States Attorney

s/ James C. Strong
JAMES C. STRONG, WSBA No. 59151
Assistant United States Attorney
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: james.strong@usdoj.gov

Attorneys for Federal Respondents

I certify that this memorandum contains 3,608 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 that on this date, I electronically filed the foregoing Federal Respondents' Return Memorandum, and the supporting Declarations of Javier Delgado and James C. Strong (with Exhibits 1-3) 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):

- 0 -

I further certify that on this date, I arranged for service of the aforementioned documents on the following non-CM/ECF participant via Certified Mail with return receipt, postage prepaid, addressed as follows:

Adan Steven Bojorge-Sequeira, *Pro Se* Petitioner
A# [redacted]
NW ICE Processing Center
1623 E. J Street, Suite 5
Tacoma, WA 98421-1615

DATED this 20th day of October, 2025.

s/ Stephanie Huerta-Ramirez
STEPHANIE HUERTA-RAMIREZ, Legal Assistant
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, WA 98101
Phone: (206) 553-7970
Fax: (206) 553-4073
Email: Stephanie.Huerta-Ramirez@usdoj.gov