

District Judge Tiffany M. Cartwright  
Magistrate Judge Brian A. Tsuchida

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

MONG TUYEN THI TRAN,

Petitioner,

v.

BRUCE SCOTT, *et al.*,

Respondents.

Case No. 2:25-cv-01886-TMC-BAT

STIPULATION REGARDING  
THIRD-COUNTRY REMOVAL

Noted for Consideration:  
October 1, 2025

Petitioner Mong Tuyen Thi Tran has filed a habeas corpus petition challenging her detention at the Northwest ICE Processing Center. Dkt. 4. In that Petition, she seeks an order preventing her removal to a country other than Vietnam. *Id.* at 21. The Court has ordered the parties to meet and confer on, among other things, whether U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) will agree not to remove Petitioner to a third country while this case is pending. Dkt. 7 at 2. ICE 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 Vietnam.

1 Dated October 1, 2025.

2 Respectfully submitted,

3 REBECCA S. COHEN  
4 Acting United States Attorney

5 s/ Annalisa L. Cravens

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14 *Counsel for Federal Respondents*

15 I certify that this memorandum contains 120 words  
16 in compliance with the Local Rules.

17 /s/ Jennifer Pasquarella

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24 *Counsel for Petitioner*

**[PROPOSED] ORDER**

For so long as this case remains pending, ICE ERO shall not remove Petitioner Mong Tuyen Thi Tran to any country other than Vietnam.

It is so ORDERED.

Dated: \_\_\_\_\_, 2025.

\_\_\_\_\_  
TIFFANY M. CARTWRIGHT  
UNITED STATES DISTRICT JUDGE