

THE HONORABLE JAMES L. ROBERT  
THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VU THANH TRAN,

Petitioner,

vs.

PAMELA BONDI, Attorney General of  
the United States; KRISTI NOEM,  
Secretary, United States Department of  
Homeland Security; CAMMILLA  
WAMSLEY, Seattle Field Office  
Director, United States Citizenship and  
Immigration Services; BRUCE SCOTT,  
Warden of Immigration Detention  
Facility; and the United States  
Immigration and Customs Enforcement,

Respondents.

No. CV25-1897-JLR-BAT

STIPULATION AND (PROPOSED)  
ORDER REGARDING THIRD-  
COUNTRY REMOVAL

Note on Motion Calendar: October 22,  
2025

Petitioner Vu Thanh Tran 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 Vietnam, absent notice and meaningful opportunity to respond in compliance with the statute and due process in reopened removal proceedings, or pursuant to a punitive banishment policy. *Id* at pp. 27–29. 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.

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

3 RESPECTFULLY SUBMITTED this 22nd day of October 2025.  
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17 I certify this motion contains 116 words in compliance with the Local Civil Rules.  
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