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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MEHRAD GHASEDI,
Petitioner,

v.

CAMMILLA WAMSLEY, *et.al.*,
Respondents.

) No. 25-cv-01984-RSM-BAT

) **MOTION FOR AND MEMORANDUM**
) **IN SUPPORT OF TEMPORARY**
) **RESTRAINING ORDER**

) Noted for 12/01/2025
) **ORAL ARGUMENT REQUESTED**
) Expedited Hearing Requested

MOTION AND MEMORANDUM OF LAW

Petitioner Mehrad Ghasedi respectfully moves this Court for an emergency order ordering his immediate release from custody and preventing his transfer and deportation in violation of his rights.

I. INTRODUCTION

1 This case is awaiting a final ruling on Petitioner’s Petition for a Writ of Habeas
2 Corpus filed on October 14, 2025. Dkt. 9. While conducting further analysis and
3 deliberation on the “multiple independent and complex issues” raised in the parties’
4 pleadings, the Court should grant this Motion to preserve the status quo and return
5 Petitioner back to his pre-detention status under the Order of Supervision. *Alliance for*
6 *the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134-35 (9th Cir. 2011); *see also* Dkt. 9.
7

8 Petitioner has been a resident of the United States for nearly 25 years. Ex. A.
9 Four years ago in March 2021, the immigration court issued an order for his removal to
10 Iran. Ex. I. Immediately after the order was entered, he was detained at the Tacoma
11 Northwest Detention Center for more than 90 days for effectuating his removal. Ex. A.
12 Unable to remove him during the 90-day statutory removal period, Respondents
13 released him under the Order of Supervision in July 2021. Ex. E. For more than four
14 years after his release, Respondent ICE has attempted to remove him to Iran but has not
15 succeeded in doing so. Ex. A.
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18 Petitioner has complied with all prior ICE orders and instructions under the
19 Order of Supervision. Ex. A. As a result, his prolonged detention does not serve any
20 legitimate purpose of preventing possible flight risk or danger to public safety. In their
21 return, Respondents have not argued that Petitioner would pose any risk to public
22 safety, or he would be a flight risk if he is released from custody. Dkt. 6&7. Meanwhile,
23 they have insisted on extending his detention without providing this Court with a clear
24 timeframe within which he will be removed to Iran or telling this Court definitively that
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1 they possess the travel document to effectuate his removal to Iran in the reasonably
2 foreseeable future. Dkt. 6&7.

3 Following the executive orders of President Donald Trump and their
4 implementation by Respondents, Petitioner believes that Respondents have adopted a
5 blanket policy to detain and immediately remove noncitizens, such as himself,
6 irrespective of any individualized circumstances in violation of his constitutional,
7 statutory and regulatory rights. Dkt. 1, ¶¶ 52-72. Respondents applied this policy to him
8 when they re-arrested him on July 17, 2025, and transferred him out of the District of
9 Oregon where he and his family reside. *Id.* In fact, according to the ICE Declaration, he
10 was arrested and detained on July 17, 2025 before his release had been officially
11 revoked. Dkt. 7, p 3. Since the date of his re-arrest, he has been detained for more than
12 120 days in the detention center in Tacoma, Washington. Because he has been
13 unlawfully detained, releasing him is consistent with due process and fundamental
14 fairness.
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18 Petitioner seeks an emergency order from this Court to halt his detention,
19 transfer out of this district, and removal from the United States.

20 Prior to filing this motion, Petitioner through counsel contacted Respondents'
21 counsel seeking their position on the motion. Counsel for Respondents in an email has
22 indicated that Respondent ICE takes no position on this motion.
23

24 **II. FACTUAL BACKGROUND AND PROCEDURAL HISTORY**

25 Petitioner is a citizen of Iran who has resided in the United States since March
26 2001. Petitioner lives in Eugene, Oregon with his mother who is a citizen of the United

1 States. Dkt. 1, ¶¶ 43. Since his release from ICE custody in July 2021, Petitioner has
2 not committed any crime or violated any laws, nor has he taken any actions that would
3 cause danger to the community or make him a flight risk. Ex. A.

4 Under the individualized facts in Petitioner's case, Respondents released him
5 under the Order of Supervision and later took off the ankle monitoring device placed on
6 him at the time of his release from custody. Ex. A&E. Petitioner has appeared in
7 person at ICE office for reporting in compliance with the Order of Supervision. *Id.*
8 Petitioner was required to appear in person for his reporting at ICE Eugene office on
9 July 17, 2025. *Id.* When he showed up at the ICE office for reporting, he was arrested
10 and then transported out of Oregon to Tacoma, Washington. *Id.* He has been detained in
11 Tacoma until today and separated from his mother and partner who live in Eugene,
12 Oregon. Ex. A-C. At the detention center, he has suffered from physical pain and
13 serious discomfort caused by a medical condition that was not properly and adequately
14 treated. Ex. F&G.

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18 On October 14, 2025, Petitioner filed with this Court the Petition for Writ of
19 Habeas Corpus requesting his release from unlawful detention. Dkt. 1. Respondents
20 filed a return to the Petition opposing his release on October 29, 2025. Dkt. 6. On
21 November 5, 2025, Petitioner filed a response to the return. Dkt. 8. On November 10,
22 2025, this Court issued an Order directing Respondents to notify the Court and all
23 parties before Petitioner may be transferred out of the district or removed from the
24 United States while the Court conducts further analysis and deliberation on the issues
25 raised in the parties' pleadings. Dkt. 9.
26

1 **III. LEGAL STANDARDS**

2 The standard for issuing a TRO is the same as the standard for issuing a
3 preliminary injunction. *See New Motor Vehicle Bd. of Cal. v. Orrin W. Fox Co.*, 434
4 U.S. 1345, 1347 n.2 (1977). A TRO is “an extraordinary remedy that may only be
5 awarded upon a clear showing that the plaintiff is entitled to such relief.” *Winter v. Nat.*
6 *Res. Def. Council, Inc.*, 555 U.S. 7, 24 (2008). “The proper legal standard for
7 preliminary injunctive relief requires a party to demonstrate (1) ‘that he is likely to
8 succeed on the merits, (2) that he is likely to suffer irreparable harm in the absence of
9 preliminary relief, (3) that the balance of equities tips in his favor, and (4) that an
10 injunction is in the public interest.’” *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1127
11 (9th Cir. 2009) (*citing Winter*, 555 U.S. at 20).

14 As an alternative to this test, a preliminary injunction is appropriate if “serious
15 questions going to the merits were raised and the balance of the hardships tips sharply
16 in the plaintiff’s favor,” thereby allowing preservation of the status quo when complex
17 legal questions require further inspection or deliberation. *Alliance for the Wild Rockies*
18 *v. Cottrell*, 632 F.3d 1127, 1134-35 (9th Cir. 2011).

20 **IV. ARGUMENT**

21 Petitioner’s Motion for a Temporary Restraining Order should be granted
22 because he is likely to suffer irreparable harm in the absence of preliminary relief, he is
23 likely to succeed on the merits, and the balance of the equities and public interest weigh
24 in favor of emergency relief.

26 **A. Petitioner will likely suffer irreparable harm.**

1 If this Court does not grant a temporary restraining order, Petitioner's detention
2 will continue in violation of his due process rights. He has been confined to the
3 detention center far away from his home in Eugene, Oregon and has been separated
4 from his mother and family members for more than 120 days. Ex. A-C. Having been
5 deprived of proper and adequate medical treatment, he has been suffering from physical
6 pain and serious discomfort while being detained in a jaillike setting in Tacoma. Ex. A,
7 F, & G. These harms are serious and irreparable, warranting this Court's grant of this
8 motion to release him immediately while this Court conducts further analysis and
9 deliberation on the legal issues raised in the parties' pleadings.
10

11 Respondents' actions have caused and will cause irreparable harm to Petitioner
12 by separating him from his family members and community in the United States and
13 forcing his loss of meaningful employment. Ex. A-C. These impacts constitute
14 irreparable harm. *See e.g., Leiva-Perez v. Holder*, 640 F.3d 962, 969-70 (9th Cir. 2011)
15 (describing "separation from family members" and the mental damage concomitant
16 with such separation as irreparable harm) (quotation marks omitted); *see also Ching v.*
17 *Mayorkas*, 725 F.3d 1149, 1157 (9th Cir. 2013) ("The right to live with and not be
18 separated from one's immediate family is 'a right that ranks high among the interests of
19 the individual' and that cannot be taken away without procedural due process.")
20 (quoting *Landon v. Plasencia*, 459 U.S. 21, 34-35 (1982)). Additionally, transferring
21 Petitioner out of his home district has deprived and will continue depriving him of
22 proximity to his loved ones and community support, distance him from access to his
23 local counsel, and impede his ability to engage in these immediate judicial proceedings.
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1 *See Arroyo v. United States Dep't of Homeland Sec.*, 2019 WL 2912848, at *17 (C.D.
2 Cal. June 20, 2019) (observing that (“a significant burden on the attorney-client
3 relationship, without a showing of underlying prejudice to the removal proceedings,
4 may be sufficient to establish a legal injury sufficient to justify injunctive relief”), citing
5 *Comm. of Cent. Am. Refugees v. I.N.S.*, 795 F.2d 1434, 1439 (9th Cir.), amended on
6 other grounds, 807 F.2d 769 (9th Cir. 1986); *see also Escobar-Grijalva v. I.N.S.*, 206
7 F.3d 1331, 1335 (9th Cir.), amended on other grounds, 213 F.3d 1221 (9th Cir. 2000)
8 (“Deprivation of the statutory right to counsel deprives [a noncitizen] asylum-seeker of
9 the one hope she has to thread a labyrinth almost as impenetrable as the Internal
10 Revenue Code.”).

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13 Furthermore, delay or lack of proper medical treatment at the detention center
14 has caused and will continue to cause Petitioner to suffer from physical pain and serious
15 discomfort. Ex. F&G. His medical records demonstrate that his medical treatment was
16 delayed due to the confinement. Ex. G. At the detention center, he was not given proper
17 and immediate medical treatment, causing him to experience physical pain and serious
18 discomfort. Ex. A. According to Petitioner’s medical records, as of August 31, 2025,
19 the nurse at the detention center suggested surgery at an outside hospital. Ex. G, p 4.
20 However, he was not brought to the hospital for a checkup until October 21, 2025, more
21 than 50 days after the needed surgery had been suggested and a week after the habeas
22 petition had been filed with this Court. Ex. A. While awaiting medical treatment, he has
23 been suffering from physical pain and serious discomfort at the detention center. *Id.*
24 Prolonged detention will cause him to continue his pain and discomfort without proper
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1 and adequate medical treatment and care. The lack or delay of proper medical
2 treatment could lead to serious medical complications, thus causing irreparable harm to
3 his health. Ex. H.

4 Finally, as alleged in Petitioner's habeas petition, Respondents' actions have
5 been arbitrary and capricious in violation of his constitutional right to due process. "It is
6 well established that the deprivation of constitutional rights unquestionably constitutes
7 irreparable injury." *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017) (internal
8 quotation omitted).

9
10 **B. Petitioner is likely to succeed on the merits of his habeas petition.**

11 Petitioner requests habeas relief from this Court on the grounds that
12 Respondents' decision to arrest and detain him violates the APA because their actions
13 are arbitrary and capricious and not in accordance with law in violation of their own
14 regulations, and his continued detention is a violation of due process when they cannot
15 remove him in the reasonably foreseeable future.
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- 17
18 1. Petitioner is likely to succeed on the merits of his claim under the
19 Administrative Procedures Act ("APA").

20 Under the APA, a court shall "hold unlawful and set aside agency action" that is
21 arbitrary and capricious, or not in accordance with law. 5 U.S.C. § 706(2)(A). An action
22 is arbitrary and capricious if the agency "entirely failed to consider an important aspect
23 of the problem, offered an explanation for its decision that runs counter to the evidence
24 before the agency, or is so implausible that it could not be ascribed to a difference in
25 view or the product of agency expertise." *Nat'l Ass'n of Home Builders v. Defs. of*
26

1 *Wildlife*, 551 U.S. 644, 658 (2007) (quoting *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v.*
2 *State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983)). To survive an APA challenge,
3 the agency must articulate “a satisfactory explanation” for its action, “including a
4 rational connection between the facts found and the choice made.” *Dep't of Com. v.*
5 *New York*, 139 S. Ct. 2551, 2569 (2019) (citation omitted).
6

7 Here, ICE/ERO’s decision to detain, transfer, and deport Petitioner despite their
8 prior determination to release him violates the APA. Since his release under the Order
9 of Supervision in July 2021, Petitioner has reported to ICE Eugene office as required,
10 and no “exceptional circumstances” have arisen since the granting of that release that
11 would make him an enforcement priority. Ex. A. Because Respondents have articulated
12 no “satisfactory explanation” for their decision to change course so dramatically and
13 detain and deport him, Petitioner is likely to succeed in his APA claim. *See Dep't of*
14 *Com.*, 139 S. Ct. at 2569.
15

16 Furthermore, ICE’s actions have been taken “not in accordance with law” by
17 failing to follow its own regulations relating to revocation of his release and his re-
18 detention. 5 U.S.C. § 706(2)(A). First, ICE’s revocation of release was not executed in
19 accordance with its regulations requiring a district director to sign the revocation based
20 on a finding that the revocation is in the public interest. 8 C.F.R. § 241.4(1)(2). The
21 revocation notice given to Petitioner was not signed by a district director and did not
22 include such a finding of public interest; it was signed by Deputy Field Office Director,
23 Erik K. Johnson. Ex. D. Second, after the re-detention, ICE provided Petitioner with
24 neither a prompt informal interview nor an opportunity to respond to the reasons
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1 supporting revocation. 8 C.F.R. § 241.4(l)(1). In fact, Respondents arrested and
2 detained Petitioner on July 17, 2025 before his release had been officially revoked;
3 According to ICE’s own Declaration, Petitioner’s release was not officially revoked
4 until July 29, 2025. Dkt. 7, p 3; Ex. D. Under *United States ex rel Accardi v.*
5 *Shaughnessy*, 347 U.S. 260, 268 (1954), U.S. government agencies are required to
6 follow their own regulations. Federal courts have consistently held ICE’s failures to
7 follow regulations warrant release of detained noncitizens. *See, e.g., Ceesay v.*
8 *Kurzdorfer*, 781 F. Supp. 3d 137, 165 (W.D.N.Y. 2025) (holding “ICE did not follow
9 its own regulations in deciding to re-detain Ceesay, his due process rights were
10 violated, and he is entitled to release”); *Rombot v. Saouza*, 296 F. Supp. 3d 383, 389 (D.
11 Mass. 2017) (“While ICE does have significant discretion to detain, release, or revoke
12 aliens, the agency must still follow its own regulations, procedures, and prior written
13 commitments.”); *Villanueva-Herrera v. Tate*, 4:25-cv-03364 (S.D. TX Sep. 26, 2025),
14 Dkt. 14 (concluding “the government violated Villanueva’s due process rights by re-
15 detaining him without complying with its own regulations and the law.”); *M.S.L v.*
16 *Bostock*, No. 6:25-cv-01204 (D. Or. Aug. 21, 2025), Dkt. 32. (holding “ICE’s failure to
17 provide Petitioner with a timely Notice of Revocation or conduct an informal interview
18 until nearly a month after taking her into custody is a grave violation of Petitioner’s due
19 process rights in that they deprived her both of a meaningful notice and an opportunity
20 to be heard.”). ICE’s actions in violation of their own regulations are not in accordance
21 with law under the APA.
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1 2. Petitioner is likely to succeed on his due process claim as his continued
2 detention has become unlawful.

3 ICE has no authority to indefinitely imprison people subject to removal orders.
4 *Zadvydas v. Davis*, 533 U.S. 678 (2001). After expiration of the 90-day statutory
5 period for detention, ICE has a presumptively reasonable period of six months to
6 effectuate removal without Court oversight. *Id.* at 701. The six-month period in the
7 instant case from entry of the removal order in March 2021 to September 2021 has long
8 passed. *See Tadros v. Noem*, No. 25-4108-EP, 2025 WL 1678501, at *3(D.N.J. June 13,
9 2025 (finding that removal period began upon entry of the removal order even though
10 the petitioner was immediately released, and rejecting the argument that the petitioner
11 did not qualify for habeas relief because he had not been detained for 6 months); *see*
12 *also Farez-Espinoza v. Chertoff*, 600 F. Supp. 2d 488, 500 (S.D.N.Y. 2009)(concluding
13 the removal period and any presumptively reasonable 6-month period of removal began
14 to run on the date the removal order became final even though the noncitizen was not
15 detained pursuant to the order). After the 6-month period, a federal court should order
16 petitioner released when it concludes there is not a “good reason to believe” that
17 removal will occur in the “reasonably foreseeable future.” *Id.*

18 Respondents’ own evidence shows ICE has been unable to remove Petitioner to
19 Iran. Dkt.7. To support their opposition to habeas relief, ICE has filed with this Court
20 the Declaration of Cristhian De Castro that demonstrated ICE has not been able to
21 obtain the travel document to remove Petitioner to Iran since the removal order was
22 issued four years ago. *Id.* The Declaration neither provides this Court with a timeframe

1 within which Petitioner will be removed to Iran in the reasonably foreseeable future,
2 nor does it inform this Court that ICE has in its possession the necessary travel
3 document that makes Petitioner's removal to Iran reasonably foreseeable. *Id.* For more
4 than four years from July 2021 to July 2025, ICE tried but failed to deport him to Iran.
5 After he was re-detained in July 2025, ICE claimed to have prepared a request for the
6 travel document on October 20, 2025, and have "sent a copy of the Travel Document on
7 October 29, 2025, via UPS mail, to the Detention and Deportation Officer, for the
8 issuance of the travel document." Dkt. 7, p. 3. Carefully reading between the lines of
9 the misleading declaration indicates the purported request for the travel document did
10 not even leave ICE as of October 29, 2025.¹ Additionally, ICE did not have the
11 required documents to secure a travel document from Iran. Iran requires "original
12 documents" for issuance of travel documents. *Kamyab v. Bondi*, Case 2:25-cv-00389-
13 RSL (W.D. Wash. Oct 14, 2025), Dkt. 21. They may include "an original passport or
14 an original birth certificate." *Id.* ICE's file only contains "a copy of [Petitioner's]
15 passport and birth certificate." Dkt. 7, p. 3. ICE has not explained how it can use the
16 copy to meet Iran's requirements for original documents. *Kamyab*, Dkt. 21. (concluding
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22 ¹ The Declaration states ICE prepared a travel document request on October 20, 2025.
23 And it went on to say: "ERO sent a copy of the **Travel Document** on October 29, 2025,
24 via UPS mail, to the Detention and Deportation Officer (DDO), for the issuance of the
25 travel document." (emphasis added). This statement is internally self-conflicting and
26 misleading; it says that ERO already had a "Travel Document," and, at the same time,
that a copy of the "travel document" was sent to DDO for **issuance** of the "travel
document". DDO is an official of ICE; the truth is nothing relating to the travel
document left ICE as of October 29, 2025, on which Respondents filed their return with
this Court.

1 generalized statements are vague and conclusory and thus insufficient to meet
2 government's burden to rebut petitioner's showing).

3 ICE has presented neither evidence showing Iran has interviewed Petitioner or
4 assessed any aspect of his travel document application,² nor a timeframe within which
5 removal would be reasonably expected. No application for the travel document is
6 presently pending before Iran's embassy. Under these circumstances, prolonged
7 detention has become unlawful in violation of due process.
8

9 Additionally, Due process requires that government action be rational and non-
10 arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007). As noted above, there
11 are no "exceptional circumstances" that justify Respondents' departure from their
12 decision to grant Petitioner release from custody. Absent a change in the facts particular
13 to his case, it is arbitrary for Respondents to decide to arrest, transfer, and detain him
14 now, especially when they detained him before his release had been officially revoked
15 by ICE. Petitioner is therefore likely to succeed on his due process claim.
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18 **C. The balance of the equities and public interest factors tip sharply in favor of**
19 **preliminary relief.**

20 Petitioner has established that "the balance of the equities tip in [his] favor and
21 that an injunction is in the public interest" because he has been a resident of the United
22 States for nearly 25 years, he is not a flight risk, and he is not a danger to the
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24 _____
25 ² The ICE declaration states: "An interview with the embassy was subsequently
26 scheduled and completed on April 20, 2021." However, it does not tell the Court who
interviewed whom: Did the Embassy interview ICE officer? Or did the embassy
interview Petitioner?

1 community. See *Winter*, 555 U.S. at 20. When the federal government is a party, the
2 balance of the equities and public interest factors merge. *Drakes Bay Oyster Co. v.*
3 *Jewell*, 747 F.3d 1073 (9th Cir. 2014) (citing *Nken v. Holder*, 556 U.S. 418, 435
4 (2009)).

5
6 The balance of hardships tips substantially in favor of Petitioner. “[I]n addition
7 to the potential hardships facing Plaintiffs in the absence of the injunction, the court
8 ‘may consider . . . the indirect hardship to their friends and family members.’”
9 *Hernandez v. Sessions*, 872 F.3d 976, 996 (9th Cir. 2017), quoting *Golden Gate Rest.*
10 *Ass'n v. City & Cty. of San Francisco*, 512 F.3d 1112, 1126 (9th Cir. 2008). Petitioner’s
11 detention and deportation would harm not only him, but also his family and other
12 community members depending on him for their financial, emotional, and spiritual
13 support. Ex. B&C. Petitioner lives in Eugene, Oregon with his mother. Ex B. He also
14 shares a family life with his partner who has two minor children from a prior
15 relationship. Ex. C. He has provided support to his partner in raising these two
16 children. *Id.* His continued detention has caused emotional hardships to his mother, his
17 partner and the two minor children he and his partner co-parent. Ex. B&C. Petitioner
18 has developed a close relationship with these children, and his continued absence from
19 their lives will likely have a long-lasting effect on their emotional wellbeing. Ex. C.
20 The public interest will be greatly benefited if Petitioner is released, so he will seek
21 gainful employment to help support the two minor children and provide them with a
22 stable and happy family environment in which they will grow up and become
23 productive members of society. Ex. C.
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1 The merits of the due process violations that Petitioner has raised in his habeas
2 petition further weight the public interest toward emergency relief. “Generally, public
3 interest concerns are implicated when a constitutional right has been violated, because
4 all citizens have a stake in upholding the Constitution.” *Preminger v. Principi*, 422 F.3d
5 815, 826 (9th Cir. 2005); *see also Zepeda v. U.S. I.N.S.*, 753 F.2d 719, 727 (9th Cir.
6 1983) (concluding that “the INS cannot reasonably assert that it is harmed in any
7 legally cognizable sense by being enjoined from constitutional violations”). In addition,
8 “the public interest also benefits from a preliminary injunction that ensures that federal
9 statutes are construed and implemented in a manner that avoids serious constitutional
10 questions.” *Rodriguez v. Robbins*, 715 F.3d 1127, 1146 (9th Cir. 2013).

13 Even when considered from a fiscal perspective, the public interest in the
14 efficient allocation of the government’s fiscal resources weighs in favor of emergency
15 relief here. As the Ninth Circuit has explained, “The costs to the public of immigration
16 detention are “staggering”: \$158 each day per detainee, amounting to a total daily cost
17 of \$6.5 million. Supervised release programs cost much less by comparison: between
18 17 cents and 17 dollars each day per person.” *Hernandez v. Sessions*, 872 F.3d 976, 996
19 (9th Cir. 2017). The interests of the general public will not be served by Petitioner’s
20 continued detention where he has been already complying with the terms of his release,
21 and he is neither a flight risk nor a danger to the community.

24 By contrast, any public interest favoring Petitioner’s continued detention is weak
25 since immigration detention is *civil* in nature and primarily serves the specific purposes
26 of preventing flight risk or danger to the community. Prolonged detention that does not

1 serve those purposes but costs the public's valuable resources does not in any form or
2 shape contribute to the betterment of the public interest. Instead, it has the opposite
3 effect. There does not exist any reason to suspect that public safety or national security
4 may somehow be at risk if the motion for a temporary restraining order is granted. Any
5 interest in executing the final removal order is more than outweighed by Petitioner's
6 lengthy residence of nearly 25 years, his strong family ties in the United States, his
7 emotional support for his partner and parenting support for her two children, and his
8 compliance with the terms of the supervision order for a period of four years, especially
9 when, as here, Respondents cannot effectuate his removal in the reasonably foreseeable
10 future due to their failure to obtain the travel document to remove him and Iran's
11 refusal and non-cooperation to issue travel documents to its nationals. Ex. A; *See also*
12 Dkt. 7.

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15 **V. CONCLUSION**

16 For the foregoing reasons, Petitioner respectfully requests that this Court grant
17 his motion for temporary restraining order to release him from detention, block his
18 transfer outside the district of Washington, and stay his removal from the United States.
19

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21 Dated: December 1, 2025.

/s/ Benjamin Wang

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I certify this document contains 4378 words in compliance with the Local Civil Rules.