THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HIEU TRI NGUYEN, Petitioner, v. 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; WARDEN of Immigration Detention Facility; and the United States Immigration and Customs Enforcement, Respondents.	No. CV25-2024-TL **HIEU TRI NGUYEN'S REPLY TO FEDERAL RESPONDENTS' RETURN MEMORANDUM** **Noted: November 14, 2025**

I. INTRODUCTION

Hieu Tri Nguyen immigrated to the United States from Vietnam when he was 17 years old. He was sponsored by his father, who had fled Vietnam years earlier as a political refugee. Mr. Nguyen's childhood years in Vietnam were marked by discrimination, abuse, and trauma, experiences Mr. Nguyen did not fully process for decades. Now, all of Mr. Nguyen's immediate family live in the United States, including his mother,[1] his siblings, and his children. Most of Mr. Nguyen's family are U.S. citizens and he has scant even extended family remaining in Vietnam. Dkt. 1 at 5–6.

[1] Mr. Nguyen's father has passed away.

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

Following a prison sentence in California, Mr. Nguyen was ordered removed to Vietnam on November 14, 2001. Dkt. 13 at 5; Dkt. 15-3. Over 23 years later, and after Mr. Nguyen has spent almost 10 months in Immigration and Customs Enforcement (ICE) custody following entry of this order, ICE has yet to submit a request for travel documents for Mr. Nguyen to Vietnam. Because the six-month grace period for removal—which began at the start of the removal period in 2001—has ended, and Respondents have not demonstrated that Mr. Nguyen's removal will likely occur in the reasonably foreseeable future, this petition should be granted and Mr. Nguyen released. There is "nothing in the current record to suggest that releasing [Mr. Nguyen] would impede the government's ability to remove him to Vietnam if the necessary travel document is obtained." *Hoac v. Becerra*, No. CV25-01740-DC-JDP, 2025 WL 1993771, at *6 (E.D. Cal. July 16, 2025). To the contrary, even while he has been detained, Mr. Nguyen's family and friends have tried to assist and inquire about anything needed to request travel documents. Dkt. 1 at 7.

And contrary to Respondents' argument, ongoing detention is not justified by Respondents' claim that Mr. Nguyen is dangerous. Dkt. 13 at 7. Such argument was rejected by *Zadvydas v. Davis*, 533 U.S. 678 (2001). And Mr. Nguyen in fact has substantially rehabilitated himself during his lengthy prison sentence, and the State of California has correctly assessed that he can and should be released.

Lastly, Mr. Nguyen's claim pertaining to third-country removal is ripe for determination.

//

//

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

II. ARGUMENT

A. The Court should order Mr. Nguyen released because Respondents have offered no credible evidence that his removal is significantly likely in the reasonably foreseeable future.

1. The six-month presumptively reasonable grace period under *Zadvydas* has ended.

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that the government does not have unrestricted authority to indefinitely detain people who have been ordered deported. Because indefinite detention of a non-citizen in immigration custody raises "a serious constitutional problem," *id.* at 690, the Court ruled that it is "presumptively reasonable" under the Immigration and Nationality Act to detain an individual for six months following a removal order. *Id.* at 701. After that time, if removal is not "significantly likely in the reasonably foreseeable future," the government must release the petitioner. *Id.*

Mr. Nguyen bears an initial burden of showing "that there is good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Nguyen v. Scott*, No. CV25-1398-TMC, -- F.Supp.3d --, 2025 WL 2419288, at *13 (W.D. Wash. Aug. 21, 2025) (cleaned up). The burden then shifts to the government—here the government Respondents—to "introduce evidence to refute that assertion." *Id.* (internal quotation marks omitted). *See also Hernandez-Escalante v. Noem*, et al., No. CV25-00182-MJT, 2025 WL 2206113, at *3 (E.D. Tex. Aug. 2, 2025) ("These regulations [8 C.F.R. § 241.13)] clearly indicate, upon revocation of an order of supervision, it is the [government's] burden to show a significant likelihood that the [non-citizen] may be removed.") (collecting cases).

Here, the Respondents appear to concede that the six months during which post-removal order detention is presumptively reasonable under *Zadvydas* has passed, stating:

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

> Since his prison release, [Mr. Nguyen] has been in custody 149 days as of the date of this filing. ***While in the aggregate, the "presumptively reasonable" six-month custody period has expired*** – Petitioner has been in ICE custody for less than five months since his release from a lengthy prison sentence. *Zadvydas*, 533 U.S. at 701.

Dkt 13 at 4 (emphasis added). Yet Respondents also claims they are not conceding that the six-month period should be calculated in aggregate detention as opposed to a period of detention following each new arrest by ICE. *See id.* at 7. Respondents present no legal authority for the supposed proposition that there is a six-month "presumptively reasonable" period of detention following each post-removal order arrest by ICE. *See generally id.*

There is no dispute that ICE has detained Mr. Nguyen for over nine months after his removal order was finalized. *See* Dkt. 13 at 7. Indeed, as of this filing, it has been nearly 10 months in total. This alone places this case outside of the presumptively reasonable six-month period under *Zadvydas*. *See Tang v. Bondi*, No. 2:25-CV-01473-RAJ-TLF, 2025 WL 2637750, at *4 (W.D. Wash. Sept. 11, 2025) ("A petitioner's total length of confinement need not be consecutive to reach the six-month presumptively reasonable limit established in *Zadvydas*.").

In fact, the six-month period under *Zadvydas* expired decades ago. This period runs from the entry of the final removal order, irrespective of detention or release during that time. It lasts only for "six months after a final order of removal—that is, three months after the statutory removal period has ended." *Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1102 n.5 (9th Cir. 2001). As the Ninth Circuit has recognized, the six-month grace period is pegged to the start of the removal period. *See Ma*, 257 F.3d at 1102 n.5 ("[I]n *Zadvydas*, the Supreme Court read the statute to permit a 'presumptively reasonable' detention period of *six months* after a final order of removal—that is, *three months* after the statutory removal period has ended."); *Rodriguez v. Hayes*, 591 F.3d 1105, 1115 (9th Cir. 2010), *overruled in other part by Jennings v. Rodriguez*, 583 U.S.

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

281 (2018) ("The [*Zadvydas*] Court determined that for six months following the beginning of the removal period [a non-citizen]'s detention was presumptively authorized."). It is not calculated based on the length of detention. *See Bailey v. Lynch*, No. CV 16-2600 (JLL), 2016 WL 5791407, at *2 (D.N.J. Oct. 3, 2016) (where order of removal became effective upon the petitioner's release from underlying conviction to ICE authorities, after which he was held only "briefly" before being released on an order of supervision, the *Zadvydas* Court's presumptively reasonable period ended "long before he was taken back into custody[.]")

Recently, in *Tran v. Bondi*, No. C25-01897-JLR, 2025 WL 3140462 (W.D. Wash. Nov. 10, 2025), the Hon. James L. Robart held that the petitioner's "*Zadvydas* grace period ended six months following the entry of the order of his removal[.]" *Id.* at *3. The court reached that conclusion even though the petitioner was not detained until two years later, and Respondents argued that only five months of the *Zadvydas* six-month period had expired, based on the times when petitioner was detained. *See* Federal Respondents' Return Memorandum and Motion to Dismiss, dkt. 13 at 1, 7 (Oct. 27, 2025). *See also, e.g., Tadros v. Noem*, No. 25-4108-EP, 2025 WL 1678501, at *3 (D.N.J. June 13, 2025) (finding that "six-month detention period under *Zadvydas*" period began upon affirmance of removal order, rejecting argument that petitioner could not obtain habeas relief because he had not yet been in detention for six months).

The Respondents' contrary argument also conflicts with *Zadvydas*'s reasoning. *Zadvydas* established the six-month grace period to allow ICE to effectuate the removal before a court's involvement. 533 U.S. at 700–01. That was why the Court chose to expand the grace period beyond the 90-day statutory removal period: because Congress likely did not "believe[ ] that all reasonably foreseeable removals could be accomplished in that time." *Id.* at 701. But in Mr. Nguyen's case, ICE has had well over six months to remove him. The final removal order was issued over 23 years ago,

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

during which ICE has had no success removing him. That Mr. Nguyen was on release for a large portion of that time makes no difference. ICE could have arranged for his removal whether he was in a prison cell or at liberty in the community. ICE also had many opportunities during his regular check-ins for years to enlist Mr. Nguyen's help in applying for travel documents. Having been given much more than six months to try to remove Mr. Nguyen, there is no principled reason to give ICE an additional grace period.

Here, Mr. Nguyen's order of removal was entered on November 14, 2001. Dkt. 15-3. Thus, his 90-day removal period began then. 8 U.S.C. § 1231 (a)(1)(B). The *Zadvydas* grace period ended six months after the entry of Mr. Nguyen's removal order and three months after his 90-day removal period, both of which occurred in April of 2002. And, Mr. Nguyen has spent almost 10 months in ICE custody after the entry of the removal order. By any legally supported means of calculation, the threshold requirement is met.

2. Respondents have failed to meet its burden of showing that Mr. Nguyen will be removed in the reasonably foreseeable future.

The Respondents assert "Petitioner's removal will likely occur in the reasonably foreseeable future." Dkt. 13 at 8. But they provide no individualized evidence supporting this assertion. *See Nguyen v. Hyde*, No. CV25-11470-MJJ, 2025 WL 1725791, *4 (D. Mass. June 20, 2025) (generalized evidence of removals to Vietnam is insufficient).

As the government concedes, ICE did not ask Mr. Nguyen to fill out paperwork to request travel documents from Vietnam until after taking him into custody—on June 19, 2025. Dkt. 13 at 6. This was over four years after the most recent agreement between Vietnamese officials and ICE regarding repatriation of pre-1995 immigrants. *See* Dkt. 1 at 9; Dkt. 1-1. As ICE was plainly aware, Mr. Nguyen was confined in a

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

California State Prison throughout this time, where ICE could have easily written to him to request he complete any needed paperwork. ICE did not do so.

Furthermore, despite Mr. Nguyen's prompt and complete cooperation with the process, returning the requested forms in just four days, Dkt. 13 at 6, Respondents concede they have yet to submit a request for travel documents to Vietnam nearly five months later. *See id.* at 8. Respondents decline to list the date they sought translation of Mr. Nguyen's forms so they could be sent to Vietnamese officials, *id.* at 6, yet blame the delay on "some delay in receiving Petitioner's translated application materials," *id.* at 8. Respondents further provide no information or estimate as to when they will complete any translations needed to submit the documents to Vietnam. *See generally id.*

If Respondents view five months' delay as merely "some delay" to translate a single application for travel documents, there is no reason to believe they will complete this translation, submit an application for travel documents, or make any progress toward actually deporting Mr. Nguyen any time soon. Respondents' own delay in even seeking travel documents demonstrates that deportation is not likely to occur in the reasonably foreseeable future. *See, e.g., Nguyen*, 2025 WL 2419288, at *14 (finding petitioner met its burden, stating "[t]o start, Petitioner has shown that ICE did not even request that that Vietnam issue him a travel document until after he filed a habeas petition.").

Further, Respondents provide no substantiation for their claim that "ICE anticipates receiving travel documents expeditiously because the government of Vietnam has agreed to issue travel documents within 30 days." Dkt. 13 at 7–8. Rather, it has been over two decades since an order of removal was entered against Mr. Nguyen, and "Vietnam has long refused to accept for deportation Vietnamese nationals who came to the United States as refugees before 1995." *Nguyen*, 2025 WL 2419288, at *6 (citing *Trinh v. Homan*, 466 F.Supp.3d 1077, 1083 (C.D. Cal. 2020)). *See also Hoac*

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

v. Becerra, No. CV25-1740-DC-JDP, 2025 WL 1993771, at *5 (E.D. Cal. July 16, 2025) ("Respondents' contention that Petitioner's removal is reasonably foreseeable because removals to Vietnam are in fact occurring is unpersuasive.").

While the Respondents optimistically assert that "[t]here is no reason to believe that" Vietnam will refuse to accept Mr. Nguyen, dkt. 13 at 8, they have provided no information about Vietnam's criteria for approving repatriation, whether Mr. Nguyen meets that criteria,[2] and concede that ICE has yet to even submit a request for travel documents to Vietnam. Neither the supposedly forthcoming request nor the accompanying documentation are part of the record—documents which are in Respondents' possession and control. Yet, such information is necessary to evaluate the likelihood of even eventual deportation because "[t]he process [for requesting travel documents] is highly dependent on the individualized facts of each case, including whether the individual has any family remaining in Vietnam, whether their Vietnamese identity can be verified, their criminal records, and the manner in which they left Vietnam and came to the United States among other factors." Dkt. 1-2 (Declaration of experienced immigration attorney Tin Thanh Nguyen, filed with Habeas petition) at 4.

The court in *Nguyen* also found noteworthy that, as here, the petitioner there was "not just an immigrant from Vietnam who happened to arrive in the United States before 1995; he is a refugee who fled Vietnam after the fall of Saigon" as a young child. *Id.* at *14. Mr. Nguyen similarly arrived in the United States as a minor, sponsored by his father who fled Vietnam as a political refugee. *See* Dkt. 1 at 5–6.

---

[2] While ICE and Vietnam have a memorandum of understanding (MOU) that sets forth Vietnam's criteria for repatriation, the government has not provided a copy of the MOU to the Court or disclosed the full criteria. *See Nguyen*, 2025 WL 2419288, at *14 ("The Court does not know what factors the Vietnamese government considers in deciding to repatriate a pre-1995 immigrant . . . . This information has been redacted from the publicly available version of the 2020 MOU, and Respondents have not offered it.").

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

Here, it appears highly unlikely that Mr. Nguyen will meet Vietnam's criteria for repatriation. He has no permanent address in Vietnam, nor does he have a Vietnamese passport or similar identification. His immediate family, including his mother and siblings, lives in the United States. So too do his children, who were born in the United States. Even most of Mr. Nguyen's extended or distant family do not live in Vietnam. *See* Dkt. 1 at 6–7.

Moreover, the attached declaration of Katie Hurrelbrink, appellate attorney for the Federal Defenders of San Diego, Inc., which was filed in *Ha Thu Thi Nguyen v. Bondi, et. al*,[3] refutes the government's generalized statement that it anticipates receiving travel documents "expeditiously." Dkt. 13 at 8. In Ms. Hurrelbrink's experience representing numerous Vietnamese immigrants detained following removal orders, many Vietnamese immigrants "have been in detention for months without receiving a travel document" and she has "never seen Vietnam respond to a travel document request within 30 days." Ex. A at ¶¶ 5, 7. The declaration of immigration specialist Tin Thanh Nguyen, also filed in *Ha Thu Thi Nguyen*[4] (and favorably credited by the court in *Nguyen v. Scott*, 2025 WL 2419288, at *15) further belies the government's representations. Tin Thanh Nguyen explains that, this year alone, he has worked on or assisted with nearly a hundred cases of pre-1995 immigrants "for whom ICE has requested travel documents from Vietnam." Dkt. 1-2 at ¶ 12. Across these cases, Mr. Nguyen has "yet to see Vietnam issue a travel document within 30 days or less" for a pre-1995 arrival. *Id.* Rather, in his experience, "it can take many months to get any answer from Vietnam about whether it will issue a travel document." *Id.*

On this record, there is insufficient evidence to support Respondents' assertion that Vietnam will repatriate Mr. Nguyen in the reasonably foreseeable future.

---

[3] *Ha Thu Thi Nguyen v. Bondi et. al.*, 25-cv-01833-JNW, dkt. 15-1.
[4] Filed with Mr. Nguyen's Habeas Petition here at Dkt. 1-2.

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

B. Respondents' argument that they can detain Mr. Nguyen because they view him as dangerous is foreclosed by *Zadvydas*.

Respondents' primary argument for detaining Mr. Nguyen—that they view him as dangerous—is unsupported by law or fact. Respondents argue, "[t]he danger Petitioner poses to the community must be considered when determining the reasonableness of his detention to date." Dkt. 13 at 7. In support of this argument, Respondents offer only a citation to 8 U.S.C. § 1231(a)(6) which authorizes continued detention of some people ordered removed on criminal grounds beyond the 90-day statutory removal period. *Id.* This limited authority to detain some immigrants for longer than 90 days in order to effectuate their removal was understood and accounted for by the Court in *Zadvydas*. Yet *Zadvydas* explicitly rejected the argument that ICE may detain an immigrant—even someone ICE views as dangerous—when there is no reasonable likelihood of removal in the reasonably foreseeable future. 533 U.S. at 684–91.

The two petitioners in *Zadvydas* both had significant criminal history. Mr. Zadvydas himself had "a long criminal record, involving drug crimes, attempted robbery, attempted burglary, and theft," as well as "a history of flight, from both criminal and deportation proceedings." *Id.* at 684. The other petitioner, Kim Ho Ma, was "involved in a gang-related shooting [and] convicted of manslaughter." *Id.* at 685. The government argued that both men could be detained regardless of their likelihood of removal, because they posed too great a risk of danger or flight. *Id.* at 690–91.

The Supreme Court rejected that argument. The Court appreciated the seriousness of the government's concerns. *Id.* at 691. But the Court found that the immigrant's liberty interests were weightier. *Id.* The Court had never countenanced "potentially permanent" "civil confinement," based only on the government's belief that the person would misbehave in the future. *Id.*

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

The Court also noted that the government was free to use the many tools at its disposal to mitigate risk: "[O]f course, the [non-citizen]'s release may and should be conditioned on any of the various forms of supervised release that are appropriate in the circumstances, and the [non-citizen] may no doubt be returned to custody upon a violation of those conditions." *Id.* at 700. The Ninth Circuit later elaborated:

> All [non-citizens] ordered released must comply with the stringent supervision requirements set out in 8 U.S.C. § 1231(a)(3). [They] will have to appear before an immigration officer periodically, answer certain questions, submit to medical or psychiatric testing as necessary, and accept reasonable restrictions on [their] conduct and activities, including severe travel limitations. More important, if [they] engage[ ] in any criminal activity during this time, including violation of [their] supervisory release conditions, [they] can be detained and incarcerated as part of the normal criminal process.

Ma, 257 F.3d at 1115.

Here, Mr. Nguyen indeed was convicted of a serious crime while under a previous order of supervision. However, as Respondents acknowledge, he spent over 12 years in prison for that crime. Dkt. 13 at 7. Such accountability by the "normal criminal process" is precisely the sanction the Ninth Circuit recognized as appropriate for this situation. *Ma*, 257 F.3d at 1115. There is no legal support for Respondents' claim that it may detain Mr. Nguyen without a significant likelihood of removal in the reasonably foreseeable future because they view him as dangerous.

Respondents also fail to acknowledge or respond to the substantial rehabilitation that Mr. Nguyen completed during his time in custody. During that time, he engaged in vocational training and furthered his education. More importantly, he engaged in mental health treatment and for the first time in his life meaningfully processed his own trauma experiences and learned to better manage and react to trauma symptoms and responses. *See* Dkt. 1 at 6. As the State of California has already correctly assessed in releasing

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

Mr. Nguyen, he does not present a danger to others, and certainly does not present a risk that could not be managed by supervision.

Respondents' claim that Mr. Nguyen is dangerous, requiring detention, is incorrect and also irrelevant. The Court in *Zadvydas* plainly rejected the argument that ICE can detain someone it deems dangerous indefinitely and held that detention must cease when there is no significant likelihood of removal in the reasonably foreseeable future. 533 U.S. at 684–91. ICE may not extend a criminal sentence beyond that properly decided by a Judge in a criminal case. ICE may not separately punish a person for a crime. ICE may not detain someone to prevent some predicted future crime. ICE may detain people for limited purposes relevant to *immigration* enforcement—here, to effectuate removal in the reasonably foreseeable future. Because there is no significant likelihood of Mr. Nguyen's removal in the reasonably foreseeable future, ICE cannot continue to detain him.

Mr. Nguyen asks this Court to grant his petition for a writ of habeas corpus and to order his immediate release.

C. As numerous courts have held, Mr. Nguyen's claim that ICE should be prevented from removing him to a third country without due process or as punishment is ripe.

Respondents also assert that Mr. Nguyen lacks standing to request an order precluding ICE from removing him to a third country because ICE has no current plan to remove him to any country other than Vietnam. Dkt. 13 at 9. A similar argument was rejected in *Nguyen v. Scott*. There, government respondents similarly represented that they were seeking only to remove the petitioner to his home country of Vietnam and stipulated that they would not attempt to remove him to any other country unless Vietnam rejected him. 2025 WL 2419288, at *27. The court was unpersuaded, explaining that "the Ninth Circuit has found such voluntary promises insufficient" to eliminate the potential irreparable injury that petitioner could face if the promises were

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

withdrawn, particularly given the underlying allegations that third-party removals were being conducted rapidly and without an opportunity for process. *Id.* at *27–28. *See also Tran v. Scott*, No. 2:25-CV-01886-TMC-BAT, 2025 WL 2898638, at *4 (W.D. Wash. Oct. 12, 2025) (stating that in petitioner's previous petition, ICE represented that removal to Vietnam was "likely to occur within two months" but "[i]n fact, ICE took no further steps to obtain a travel document for Petitioner or effectuate her removal until after she filed this habeas action—while she has languished needlessly in detention for five months"); *see also id.* (court pointing out in another case that government had represented a travel document was "in the mail," yet counsel from that case stated neither she nor her client had received it more than a month later).

Moreover, in *Louangmilith v. Noem, et al.*, No. 25-cv-2502-JES-MSB, 2025 WL 2881578 (S.D. Cal. Oct. 9, 2025), the court rejected government respondents' exact argument here that "this situation is not ripe for adjudication because ICE is not seeking to remove Petitioner to a third country." *Id.* at *4. Despite the government respondents' representations, the court citing to *Nguyen v. Scott*, 2025 WL 2419288, at *27, stated it was "more persuaded by Petitioner's arguments" that "by the time [the claim] is ripe by the government's argument, it will be too late for the individuals to meaningfully challenge the removal." *Id.* (granting petition on claim that ICE should be prevented from removing petitioner to a third country without due process).

In addition, the events cited in Mr. Nguyen's petition, dkt. 1 at 16–24, demonstrate that the government, including Respondents here, has undertaken rapid third-country removals without even the process required by its own regulations, further showing that such an action against Mr. Nguyen is sufficiently likely to make the matter ripe.

//

//

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100

III. CONCLUSION

Based on the foregoing, the Court should grant the petition in its entirety.

DATED this 14th day of November 2025.

Respectfully submitted,

s/ *Rebecca Fish*
Assistant Federal Public Defender
Attorney for Hieu Tri Nguyen

FEDERAL PUBLIC DEFENDER
1601 Fifth Avenue, Suite 700
Seattle, Washington 98101
(206) 553-1100