

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

7 IGOR PANFILOV, 8 Petitioner, 9 v. 10 PAMELA BONDI, et al., 11 Respondents.))))))	No. 2:25-cv-2027-TMC STIPULATED MOTION REGARDING THIRD-COUNTRY REMOVAL AND (PROPOSED) ORDER Note on Motion Calendar: October 29, 2025
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Petitioner Igor Panfilov has filed a habeas corpus petition challenging his detention at the Northwest ICE Processing Center. Dkt. #1. In that petition, Petitioner seeks an order preventing removal to a country other than Kyrgyzstan, absent notice and meaningful opportunity to respond in compliance with the statute and due process in reopened removal proceedings. 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.

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

[Signature Page Follows]

1 RESPECTFULLY SUBMITTED this 29th day of October 2025.

2
3 CHARLES NEIL FLOYD
4 United States Attorney

5 s/ Michelle R. Lambert
6 Michelle R. Lambert, NYS #4666657
7 s/ Katherine G. Collins
8 Katherine G. Collins, CA #315903
9 Assistant United States Attorneys
10 Western District of Washington
11 United States Attorney's Office
12 700 Stewart Street, Suite 5220
13 Seattle, Washington 98101-1271
14 Phone: (206) 428-3800
15 E-mail: michelle.lambert@usdoj.gov
16 Katherine.collins@usdoj.gov

s/ Vicki W.W. Lai
Vicki W.W. Lai, WSBA No. 23935
Assistant Federal Public Defender
Federal Public Defender
1601 Fifth Avenue, Ste 700
Seattle, WA 98101
Phone: 206-553-1100
E-mail: vicki_lai@fd.org

Attorney for Petitioner

Attorneys for Federal Respondents

14 I certify this motion contains 102 words in compliance with the Local Civil Rules.

[PROPOSED] ORDER

1 For so long as this case remains pending, ICE ERO shall not remove Petitioner
2 Igor Panfilov to any country other than Kyrgyzstan.
3

4 It is so ORDERED.

5 Dated this ___ day of _____ 2025.
6
7

8 _____
9 TIFFANY M. CARTWRIGHT
10 UNITED STATES DISTRICT JUDGE

11 Presented by:

12
13 *s/ Vicki W.W. Lai*
14 Assistant Federal Public Defender
15 Attorney for Igor Panfilov

16 *s/ Michelle R. Lambert*
17 *s/ Katherine G. Collins*
18 Assistant United States Attorneys
19 Attorneys for Federal Respondents
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