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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Hector Adan LOPEZ ROJOP
Petitioner,

v.

Cammilla WAMSLEY, Seattle Field Office
Director, Enforcement and Removal
Operations, United States Immigration and
Customs Enforcement (ICE); **Bruce SCOTT**,
Warden, Northwest ICE Processing Center;
Kristi NOEM, Secretary, United States
Department of Homeland Security; **UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY (DHS)**; **Pamela BONDI**,
Attorney General of the United States;
**EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW (EOIR)**; **Daren
K. MARGOLIN**, Director, EOIR,

Respondents.

Case No. 25-CV-2058

**PETITIONER'S REPLY TO
FEDERAL RESPONDENTS' RETURN
MEMORANDUM [DKT. 13]**

1 Petitioner Hector Adan Lopez Rojop (“Petitioner”), through undersigned counsel,
2 submits this reply to Respondents’ Response [Dkt. 13], filed on October 27, 2025.

3 Respondents acknowledge the Court’s summary judgement order in *Rodriguez Vazquez*
4 and do not contest Petitioner’s membership in the Bond Denial Class. Dkt. 13 at 2-3. They posit
5 that if the Court were to grant habeas relief to Petitioner, the appropriate remedy would be either
6 “a bond redetermination hearing in the immigration court pursuant to 8 U.S.C. § 1226(a) or to be
7 released upon payment of the bond amount found in the alternate order by the IJ.” *Id.* at 3.
8 However, at the bond hearing on October 21, 2025, the Immigration Judge concluded that
9 Petitioner does not pose a flight risk nor a danger to the community; although the IJ found he had
10 no jurisdiction to order bond, in the alternative he ordered that Petitioner be released on bond in
11 the amount of \$7,500. Dkt. 5-1. As nothing has changed since Petitioner’s bond hearing—other
12 than Petitioner languishing an additional six days in unlawful detention—there is no basis to
13 order another bond redetermination hearing, which would be a waste of agency resources.
14 Rather, the Court should order that the IJ’s alternative bond order be effectuated and that
15 Petitioner be permitted to post bond immediately.

16 Date: October 27, 2025

17
18 /s/ Abby Sullivan Engen
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