

District Judge Kymberly K. Evanson

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THO VAN HUYNH,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 2:25-cv-02093-KKE

JOINT STATUS REPORT

**JOINT STATUS REPORT**

Pursuant to this Court’s Order Directing Parties to Meet and Confer and File a Joint Status Report (Dkt. 10), the parties have met and conferred and submit this joint status report in response to the Court’s order.

(1) Updates on Timeline.

**Federal Respondents’ Position and Update:** Federal Respondent’s submit that there was an error in Petitioner’s travel document, which was assembled in early November 2025. *See* Declaration of Wiley Brown (“Brown Decl.”) ¶ 3. Immigration and Customs Enforcement (“ICE”) discovered that one necessary page for the submission has not been translated. *Id.* That page was resubmitted to an outside translation service. *Id.* Upon receipt of the missing page, the

1 travel document request packet was completed and resubmitted for review. *Id.* ¶ 4. On December  
2 3, 2025, the travel document request packet was forwarded to ICE Enforcement and Removal  
3 Operations (“ERO”) headquarters for review and elevation to the ERO attache in Vietnam. *Id.* ¶  
4 5. ICE believes that once the travel document is forwarded to Vietnam, Vietnam will issue the  
5 travel document within 30 days. *Id.* ¶ 6.

6 **Petitioner’s Position:** Petitioner disagrees with this timeline assessment because there is  
7 no information about when the document will be forwarded to Vietnam and there is no guarantee  
8 that Vietnam will ultimately agree to issue travel documents. In addition, it has taken much longer  
9 than 30 days for Vietnam to respond in other cases.

10 (2) Stipulated Order. Federal Respondents will further agree to a stipulated order not to  
11 deport Petitioner to any country other than Vietnam while this case is pending.

12 Dated this 3rd day of December, 2025.

13 Respectfully submitted,

14 CHARLES NEIL FLOYD  
United States Attorney

FEDERAL PUBLIC DEFENDER’S OFFICE

15 *s/ Alexandria K. Morris*

*s/ Colin Fieman*

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