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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Giny FRANCOIS, Hector Moises  
DAVILA ZURITA, Jean Carlos  
PINTO BAUTISTA,

Petitioners,

v.

Cammilla WAMSLEY, et al.,

Respondents.

Case No. 2:25-cv-2122-RSM-GJL

**PETITIONERS' NOTICE OF  
SUPPLEMENTAL FACTS**

Petitioners hereby notify the Court that since the filing of Petitioners' Motion for a Temporary Restraining Order earlier today at 10:46 am, Dkt. 8, undersigned counsel have learned that Petitioner Hector Moises Davila Zurita was also transferred out of the Western District of Washington, *see* Decl. of Elizabeth Harrington (Harrington Decl.) ¶¶ 6–7. Like Petitioner Jean Carlos Pinto Bautista, Mr. Davila is believed to be currently detained at the Otero County Processing Center in New Mexico. Dkt. 10 at 2 ¶ 8; Harrington Decl. ¶¶ 7–8.

Attached are documents in support of these factual developments, including a screenshot of the Executive Office for Immigration Review's (EOIR) Automated Case Information System results for Mr. Davila, which show that he is now scheduled for a master calendar hearing on November 18, 2025 in the Otero Immigration Court. *See* Ex. A.

In light of Mr. Davila's abrupt transfer out of this district and because the interests in support of Mr. Pinto's return are likewise applicable in Mr. Davila's case, Petitioners request that

1 the Court grant their pending Motion for a Temporary Restraining Order and include an order for  
2 the immediate transfer of both Mr. Pinto and Mr. Davila back to Washington State and their  
3 immediate release from detention upon return to this district. An amended proposed order is  
4 attached.

5 Respectfully submitted this 31st day of October, 2025.

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