

The Honorable Tana Lin
The Honorable Grady J. Leupold

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Uriel MENDOZA ARAIZA,
Petitioners,

v.

Laura HERMOSILLO, et al.,
Respondents.

Case No. 2:25-cv-2139-TL-GJL

PETITIONER'S TRAVERSE

Note on Motion Calendar:
November 24, 2025

Respondents' return confirms Petitioner Uriel Mendoza Araiza's entitlement to relief as a Bond Denial Class member under the declaratory judgment in *Rodriguez Vazquez v. Bostock*, No. 3:25-cv-05240-TMC, --- F. Supp. 3d ----, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025). Dkt. 9 at 3. The Court should accordingly grant Mr. Mendoza's request for a writ of habeas corpus ordering that Respondents release him unless within seven days of this Court's order they administer a bond hearing under 8 U.S.C. § 1226(a). Dkt. 1 at 5 ¶ b; *see also* Dkt. 9 at 4 (agreeing the "appropriate relief would be for him to have a bond redetermination hearing in the immigration court pursuant to 8 U.S.C. § 1226(a)"). The Court should also clarify that the Immigration Judge may not conclude that Mr. Mendoza is subject to detention under 8 U.S.C. §§ 1226(c) or 1225(b)(2). Dkt. 1 at 5 ¶ b. Given that Respondents have not contested Mr. Mendoza's class membership, that the *Rodriguez Vazquez* declaratory judgment recognizes class

1 members' entitlement to relief, and that the liberty interest at stake is significant, Mr. Mendoza
2 respectfully requests that the Court consider his petition forthwith instead of waiting for the
3 noting date.

4
5 Submitted this 17th day of November, 2025.

6
7 s/ Glenda M. Aldana Madrid
8 Glenda M. Aldana Madrid,
9 WSBA No. 46987
10 glenda@nwirp.org

I certify this traverse contains 199 words in
compliance with the Local Civil Rules.

11
12 s/ Matt Adams
13 Matt Adams, WSBA No. 28287
14 matt@nwirp.org

15
16 s/ Leila Kang
17 Leila Kang, WSBA No. 48048
18 leila@nwirp.org

19
20 s/ Aaron Korthuis
21 Aaron Korthuis, WSBA No. 53974
22 aaron@nwirp.org

23
24 s/ Amanda Ng
25 Amanda Ng, WSBA No. 57181
26 amanda@nwirp.org

27
NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Suite 400
Seattle, WA 98104
(206) 957-8611

Counsel for Petitioner