

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juan LEON FIGUEROA, et al.,
Petitioners,

v.

Cammilla WAMSLEY, et al.,
Respondents.

Case No. 2:25-cv-2228-TMC

**PETITIONERS' TRAVERSE AND
REPLY IN SUPPORT OF
PETITION FOR WRIT OF
HABEAS CORPUS**

Note on Motion Calendar:
November 19, 2025

Respondents offer no meaningful response to Petitioners' petition for a writ of habeas corpus. They have no defense *whatsoever* to denying Petitioners Leon Figueroa and Gudiño Herrera release on their alternative bond order. As to Petitioners Carrillo Ahilon and Lopez Mendez, they assert only that they are not class members because they have not requested bond hearings. This Court has repeatedly rejected that argument. *See Ortiz Martinez v. Wamsley*, No. 2:25-CV-01822-TMC, 2025 WL 2899116, at *4 (W.D. Wash. Oct. 10, 2025) ("That Rojas has not yet requested a bond hearing is not a basis for denying her habeas petition."); *Marcial Navarette v. Wamsley*, No. 2:25-CV-02150-TMC, 2025 WL 3134712, at *1 (W.D. Wash. Nov. 10, 2025) (same). And in any event, they have requested such hearings by virtue of this habeas petition. The Court should accordingly grant the habeas petition "forthwith." 28 U.S.C. § 2241.

1 Respectfully submitted this 19th day of November, 2025.

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*Counsel certifies that this motion contains 144
words, in compliance with the Local Civil
Rules.*

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