

THE HONORABLE DAVID G. ESTUDILLO
THE HONORABLE GRADY J. LEUPOLD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PHUNG THI THANH VO,

Petitioner,

vs.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; CAMMILLA
WAMSLEY, Seattle Field Office
Director, United States Citizenship and
Immigration Services; BRUCE SCOTT,
Warden of Immigration Detention
Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No. CV25-2244-DGE-GJL

STIPULATED MOTION REGARDING
THIRD-COUNTRY REMOVAL AND
TRANSFER FROM DISTRICT

Noted for Consideration:
November 20, 2025

Petitioner, Phung Vo, has filed a habeas corpus petition challenging her detention at the Northwest ICE Processing Center. Dkt. 1. In that Petition, she seeks an order preventing her removal to a country other than Vietnam, absent notice and meaningful opportunity to respond in compliance with the statute and due process in reopened removal proceedings. The parties have conferred, and U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) is not seeking to effectuate Petitioner's removal to a third country.

Therefore, ICE ERO and Petitioner stipulate to a motion barring ICE ERO from removing Petitioner to any country other than Vietnam while this action is proceeding.

1 In order to avoid “interfer[ing] with [Petitioner’s] access to counsel and ability to
2 participate in the proceedings,” the parties also stipulate to an order barring Federal
3 Respondents from removing Petitioner from this district while this action is proceeding,
4 other than removal to Vietnam. *See Tran v. Bondi, et. al.*, No. CV25-cv-01897-JLR-
5 BAT, Dkt. 6, at 3 (Oct. 7, 2025) (*sua sponte* issuing such an order in a § 2241 case
6 involving an ICE detainee).

7 DATED this 20th day of November, 2025.

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9 Respectfully submitted,

10 CHARLES NEIL FLOYD
11 United States Attorney

12 s/ Katherine G. Collins
13 Katherine G. Collins, CA #315903
14 Assistant United States Attorney
15 United States Attorney’s Office
16 Western District of Washington
17 700 Stewart Street, Suite 5220
18 Seattle, Washington 98101-1271
19 Phone: 206-553-7970
20 Fax: 206-553-4067
21 Email: katherine.collins@usdoj.gov

s/ Alan Zarky
Alan Zarky, WSBA No. 15155
Staff Attorney
Federal Public Defender
1331 Broadway, Ste 400
Tacoma, WA 98402
Phone: 253-593-6710
E-mail: alan_zarky@fd.org
Attorney for Petitioner

22 *Attorneys for Federal Respondents*

23 I certify this document contains 181 words in compliance with the Local Civil Rules.
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