

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SOKHA SUONG,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; *et al.*,

Respondents.

No. CV25-2309-LK

**PETITIONER'S RESPONSE
MEMORANDUM**

Noted on Motion Calendar:
December 8, 2025

I. INTRODUCTION

Mr. Suong stands committed of various offenses and as a result has a final order of removal. But in the four years he has been released under supervision, he has complied fully with that supervision, including committing no violations of law. As detailed below, his current detention is unlawful under three separate grounds: the holding of *Zadvydas v. Davis*, 533 U.S. 678 (2001), his due process right not to be re-detained without a hearing, and his regulatory rights regarding re-detention. The Court should order his immediate release.

II. MR. SUONG'S DETENTION HAS BECOME UNCONSTITUTIONALLY PROLONGED UNDER *ZADVYDAS*.

A. There is no reason to believe either that Mr. Suong is likely to be removed to Cambodia or that any such removal would occur in the reasonably foreseeable future.

Respondents' submission says it all: They assure the Court that "based on current experience, ICE believes that the government of Cambodia will *ultimately* issue a TDR for Petitioner. ICE *may* also be able to obtain a TDR for Thailand." Dkt. 16 ¶ 17

(emphasis added). But whether a detainee “will ultimately” be removed is far from the test under *Zadvydas*. Rather, it is whether there is a significant likelihood of removal in the reasonably foreseeable future. While Respondents state that they believe that test has been met, their facts show nothing more than what they attest, that removal may “ultimately” occur. Nor is the test met as to Thailand, where Respondents can only say that they “may” be able to obtain travel documents (with no facts supporting even that insufficient conclusion).

Contrary to Respondents’ contention, dkt. 14 at 7, they never show that the facts in Mr. Suong’s petition fail to initially raise a “good reason” to believe removal is not reasonably foreseeable.¹ Respondents instead present new evidence supposedly rebutting those facts. But their rebuttal evidence goes not to whether Mr. Suong has met his burden, but to a different question, namely whether, *if* Mr. Suong has met his burden, they have satisfactorily rebutted it. Those are two quite different questions. *See, e.g., Deqa M. Y. v. Barr*, No. 20-CV-1091 (ECT/DTS), 2020 WL 4928321, at *4 (D. Minn. June 16, 2020), *report and recommendation adopted*, No. 20-CV-1091 (ECT/DTS), 2020 WL 4926618 (D. Minn. Aug. 21, 2020) (concluding that, “[a]lthough Deqa has made a sufficient showing that her removal is not significantly likely to occur in the reasonably foreseeable future, Respondents have now rebutted that showing”).

¹ Respondents do “not concede that Petitioner’s detention should be measured in the aggregate,” but provide no contrary authority, and have thus waived the issue. Dkt. 14 at 6. For additional cases beyond that cited in his petition, dkt. 1 at 8, *see, e.g., Nguyen v. Scott*, No. 2:25-CV-01398, 2025 WL 2419288, *13 (W.D. Wash. Aug. 21, 2025) (aggregating original and current periods of incarceration). Outside of this district, too, “[c]ourts . . . broadly agree” that Respondents’ approach to counting the length of the noncitizen’s detention is not correct. *Diaz-Ortega v. Lund*, No. 1:19-CV-670-P, 2019 WL 6003485, at *7 n.6 (W.D. La. Oct. 15, 2019), *report and recommendation adopted*, 2019 WL 6037220 (W.D. La. Nov. 13, 2019); *see also Sied v. Nielsen*, No. 17-CV-06785-LB, 2018 WL 1876907, at *6 (N.D. Cal. Apr. 19, 2018) (collecting cases).

1 Thus, Respondents' argument about whether Mr. Suong's initial burden has been
2 met misses the mark. The fact that he was not born in Cambodia, dkt. 1 at 6, that he has
3 no documentation pertaining to his birth or citizenship, *id.*, and that Respondents had
4 been unable to previously obtain travel documents, dkt. 14 at 4, all combine to meet Mr.
5 Suong's initial burden.

6 As to Respondents' burden to rebut that showing, their pleading and supporting
7 declaration are full of conclusory assertions that Mr. Suong's removal is reasonably
8 foreseeable. Dkt. 14 at 1, 2, 7; dkt. 16 ¶¶ 10, 17. But of course it is this Court's task to
9 make that determination based on the facts that the parties have submitted, not just rely
10 on Respondents' conclusion. *See Zadvydas*, 533 U.S. 678 at 701 (government's burden
11 is to "respond with evidence" sufficient to show likelihood of removal in reasonably
12 foreseeable future).

13 Respondents' burden comprises two showings: can Respondents demonstrate
14 that Mr. Suong is reasonably likely to be removed to Cambodia at all, and can they
15 show that any such removal is likely in the reasonably foreseeable future. Respondents
16 must show both to prevail. They show neither.

17 As to the first, Respondents present no relevant facts at all. They present no
18 evidence as to what criteria Cambodia applies in deciding whether to issue travel
19 documents to individuals demonstrated to be citizens, let alone to individuals born
20 outside of Cambodia and lacking any paperwork pertaining to their citizenship. There
21 are no facts showing that Cambodia even considers Mr. Suong a citizen.² While
22 Respondents aver that there has been "increased cooperation" between the United
23 States and Cambodia, dkt. 14 at 7, that tells this Court nothing about whether Cambodia
24

25 ² Although Respondents include paperwork referencing Mr. Suong's statement that *he*
26 considers himself a Cambodian citizen, dkt. 15-1 at 5, they present no evidence that Mr.
Suong had any legal knowledge of what satisfies *Cambodia's* determination of
citizenship.

1 is likely to issue travel documents *for Mr. Suong*. See also *Nguyen*, 2025 WL 2419288,
2 at *16 (finding a claim of increased cooperation between Vietnam and United States
3 insufficient to meet Respondents' burden), and *Abubaka v. Bondi*, No. C25-1889RSL,
4 2025 WL 3204369, *5 (W.D. Wash. Nov. 17, 2025) (same).

5 Respondents also state that “[t]here have been 55 removals to Cambodia in fiscal
6 year (“FY”) 2025 as of September 2, 2025.” Dkt. 16 at ¶ 14. But they do not identify
7 how many requests for travel documents the United States made to Cambodia that
8 resulted in those 55 removals. A “numerator alone [is] meaningless without the
9 denominator[.]” *Emigra Grp., LLC v. Fragomen, Del Rey, Bernsen & Loewy, LLP*, 612
10 F. Supp. 2d 330, 367–68 (S.D.N.Y. 2009). And even if there were a denominator, this
11 would tell this Court nothing about the potential for removal of an individual such as
12 Mr. Suong. Those 55 may well have all been individuals with clear evidence of
13 Cambodian citizenship (or whatever other criteria Cambodia applies, which, again, we
14 do not know).

15 These are the only facts Respondents have presented that relate to whether
16 Cambodia is reasonably likely to issue travel documents for Mr. Suong at all, let alone
17 in the reasonably foreseeable future. Combining meaningless data with vague
18 assurances is hardly sufficient to meet Respondents' burden.

19 As to that latter showing, Respondents present, if anything, even less
20 information. They give no data about how quickly removal occurred in those 55
21 instances during the past year. They state that they have requested that Cambodia
22 provide a response as to Mr. Suong within 30 days, but that period had already passed
23 by the time of Respondents' pleading. Dkt. 16 ¶ 11. The only meaningful reference to
24 timing is the statement that “[t]here is no definitive timeframe for TDR's for
25 Cambodian citizens,” which hardly gives this Court any assurance of a timely removal.
26 Dkt. 16 ¶ 13. The additional statement in that paragraph, “The embassy is actively

1 coordinating interviews once the TDR reaches the government of Cambodia,” asserts
2 nothing to show that such interviews occur within a reasonable timeframe. Nor is there
3 any indication of how long travel documents might take to issue (*if* they issue) after
4 interviews occur.

5 In sum, Respondents have shown neither that Mr. Suong is reasonably likely to
6 be removed to Cambodia nor that such removal would occur in the reasonably
7 foreseeable future. A failure as to either would be enough to validate Mr. Suong’s
8 *Zadvydas* claim; here, there is failure as to both.

9 Respondents’ showing as to Thailand is equally weak. There is the same lack of
10 any facts suggesting that Thailand would ever issue travel documents for Mr. Suong, let
11 alone that it would do so in the reasonably foreseeable future.

12 Respondents’ only other contribution is to suggest, almost as an afterthought,
13 that removal is *always* reasonably foreseeable, unless removal to the specified country
14 is *impossible*. Dkt 14 at 7 (citing to *Diouf v. Mukasey*, 542 F. 3d 1222, 1233 (9th Cir.
15 2008)). But *Diouf* involved a highly unusual fact pattern. ICE arrested the petitioner
16 after he failed to depart voluntarily. 542 F.3d at 1226. ICE then “made arrangements for
17 Diouf to depart for Senegal, on May 26, 2005, but, after Diouf refused to leave on that
18 date, continued to detain him.” *Id.* Diouf fought off deportation by filing two motions to
19 reopen and by obtaining a series of stays of removal from the Ninth Circuit. *Id.*

20 The reason for Diouf’s prolonged detention, therefore, and the only obstacle to
21 his removal, was his own actions, including his pending petition before the Ninth
22 Circuit and the attendant stay order. Diouf’s detention was thus not open-ended (or
23 indefinite), since it would naturally terminate upon a decision by the Ninth Circuit. The
24 import of *Diouf*, therefore, is that a petitioner objecting to his removal cannot obtain
25 release under *Zadvydas* unless he shows he would be “unremovable even if the
26 government defeated his petition for review.” *Id.* at 1233. Since Senegal had already

1 issued travel documents, Diouf could not meet that burden. The court cited to *Prieto-*
2 *Romero v. Clark*, 534 F.3d 1053, 1063 (9th Cir. 2008), where, similarly, “repatriations
3 to Prieto–Romero’s country of origin, Mexico, are routine and . . . the government
4 stands ready to remove Prieto–Romero as soon as judicial review is complete.” It is in
5 situations such as those, when the delay is caused by judicial review, that removal is
6 unforeseeable only if the removal country will not accept the detainee.

7 There is no basis for reading these cases as applying to situations such as Mr.
8 Suong’s. If the government’s position were accepted, it would mean that the numerous
9 recent decisions in this district, and the scores or hundreds of decisions elsewhere
10 throughout the Circuit, all erred in finding a *Zadvydas* violation based on delay of
11 removal, without also requiring a showing that removal could not occur.

12 With Respondents not having met their burden of showing that removal is not in
13 the reasonably foreseeable future, and with their brief citation to *Diouf* inapplicable,
14 Mr. Suong’s rights under *Zadvydas* have been violated, calling for his immediate
15 release.

16 **B. Mr. Suong’s criminal history is, as Respondents elsewhere concede,**
17 **“completely irrelevant” to the *Zadvydas* analysis.**

18 Since being released from prison four years ago, Mr. Suong has violated no
19 condition of his release by ICE, including committing no offenses. Nevertheless,
20 Respondents contend that, in analyzing his *Zadvydas* claim, “it cannot be overlooked
21 that [Mr. Suong] has demonstrated a concerning pattern of domestic abuse, and public
22 safety weighs in favor of Petitioner’s detention at this time.” Dkt. 14 at 6. This attempt
23 to link a detainee’s criminal history to the *Zadvydas* standard is directly contrary to
24 Respondents’ assertions elsewhere. As Respondents themselves put it in their pleading
25 in another case filed in this district just last week: “[w]hether [petitioner] poses a flight
26 risk or a danger to the community [is] *completely irrelevant*. The *only proper*

1 *consideration* under *Zadvydas* is whether there is a significant likelihood of removal in
2 the reasonably foreseeable future[.]” Federal Respondents’ Return Memorandum, *Kuot*
3 *v. Bondi*, No. 2:25-cv-02313-RAJ-BAT, dkt. 14 at 10 n.5 (W.D. Wash. Dec. 3, 2025)
4 (emphasis added). Respondents were correct in *Kuot* and are wrong here.

5 *Zadvydas* itself involved two petitioners with significant criminal histories.
6 Mr. Zadvydas had “a long criminal record, involving drug crimes, attempted robbery,
7 attempted burglary, and theft,” as well as “a history of flight, from both criminal and
8 deportation proceedings.” 533 U.S. at 684. The other petitioner, Kim Ho Ma, was
9 “involved in a gang-related shooting [and] convicted of manslaughter[.]” *Id.* at 685. The
10 government argued that both men could be detained regardless of their likelihood of
11 removal, because they posed too great a risk of danger or flight. *Id.* at 690–91.

12 The Supreme Court rejected that argument. The Court appreciated the
13 seriousness of the government’s concerns. *Id.* at 691. But it found that the immigrants’
14 liberty interests were weightier. *Id.* The Court had never countenanced “potentially
15 permanent” “civil confinement,” based only on the government’s belief that the person
16 would misbehave in the future. *Id.*

17 The Court also noted that the government was free to use the many tools at its
18 disposal to mitigate risk: “[O]f course, the [noncitizen]’s release may and should be
19 conditioned on any of the various forms of supervised release that are appropriate in the
20 circumstances, and the [noncitizen] may no doubt be returned to custody upon a
21 violation of those conditions.” *Id.* at 700. The Ninth Circuit later elaborated:

22 All [noncitizens] ordered released must comply with the stringent
23 supervision requirements set out in 8 U.S.C. § 1231(a)(3). [They] will
24 have to appear before an immigration officer periodically, answer certain
25 questions, submit to medical or psychiatric testing as necessary, and
26 accept reasonable restrictions on [their] conduct and activities, including
severe travel limitations. More important, if [they] engage[] in any
criminal activity during this time, including violation of [their]

1 supervisory release conditions, [they] can be detained and incarcerated as
2 part of the normal criminal process.

3 *Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1115 (9th Cir. 2001).

4 Thus, if this Court finds that Mr. Suong's detention has been prolonged
5 impermissibly under *Zadvydas*, the remedy for Respondents' concern is release with
6 appropriate conditions, not continued detention.

7 **III. MR. SUONG WAS CONSTITUTIONALLY ENTITLED TO A HEARING
8 PRIOR TO BEING RE-DETAINED.**

9 Respondents' discussion of the due process issue fares them no better. As to the
10 liberty interest, Respondents cite only cases making general pronouncements about
11 Congressional power over immigration. Dkt. 14 at 8, Respondents provide no
12 meaningful response to the numerous decisions finding, in the specific context of re-
13 detention, a liberty interest that requires a pre-detention hearing for those with final
14 orders of removal.³

15 Respondents then suggest that Mr. Suong's claim depends on showing that
16 "Respondents promised him ongoing, limitless, indefinite freedom from detention while

17 ³ Mr. Suong will briefly address an issue not raised by Respondents here, but raised in
18 another case in this district, in case the Court should have a question about the issue.
19 None of the cases cited in the constitutional due process portion of Mr. Suong's
20 petition, dkt. 1 at 8-11, involved a detainee with a final order of removal. Nevertheless,
21 numerous other cases involving re-detention of petitioners with final orders of removal
22 have applied the same due process analysis as the cases Mr. Suong cited. Just recently,
23 Judge Ricardo Martinez held, "Based on this review of the *Mathews* factors, the Court
24 finds that Petitioner has a protected liberty interest in his continuing release from
25 custody, and that due process requires that Petitioner receive proper notice and an
26 opportunity to respond before he can be re-detained." *Jimenez v. Bondi*, No. C25-
2167RSM, 2025 WL 3466925, at *2 (W.D. Wash. Dec. 3, 2025). The court granted the
petition and ordered Jimenez's immediate release, barring re-detention without
providing "adequate notice of the reasons for his re-detention and a meaningful
opportunity to respond." *Id.* at *3. *See also, e.g., P.T. v. Hermosillo*, No. C25-2249-
KKE, 2025 WL 3294988, at *3 (W.D. Wash. Nov. 26, 2025); *Perez v. Mordant*, No.
2:25-CV-00947-SPC-DNF, 2025 WL 3466956, at *5 (M.D. Fla. Dec. 3, 2025); *S-M-J*
v. Bostock, No. 6:25-CV-01425-MTK, 2025 WL 3137296, at *5 (D. Or. Nov. 10,
2025).

1 he remained in the United States.” Dkt. 14 at 8. In fact, his claim is grounded on the
2 Due Process Clause, which guarantees him certain protections before he can be re-
3 detained, as discussed in his petition.

4 Respondents’ next contention is equally misplaced. They argue that Mr. Suong
5 has a minimal interest in liberty because *they* have determined that there is a significant
6 likelihood of removal in the reasonably foreseeable future. *Id.* But what the cases cited
7 in his petition and in footnote 3, *supra*, along with numerous other decisions, all hold
8 that there has to be notice, a hearing before a neutral decision maker, and an
9 opportunity to respond. Thus, Respondents don’t get to make that decision about
10 foreseeability on their own, with no hearing and no requirement for evidence.

11 And Respondents’ discussion of the third *Mathews* factor relies on an
12 irrelevancy, their interest in enforcing the immigration laws. Dkt. 14 at 9. That is not
13 the governmental interest at issue. As stated in *Perera v. Jennings*, No. 21-CV-04136-
14 BLF, 2021 WL 2400981, at *5 (N.D. Cal. June 11, 2021) “the interest at stake is not
15 whether the government may detain [a noncitizen after releasing him], but whether they
16 may do so without providing him an individualized bond hearing.” And “the
17 Government’s interest in re-detaining non-citizens previously released without a
18 hearing is low [.]” *P.T. v. Hermosillo*, No. C25-2249-KKE, 2025 WL 3294988, at *3
19 (W.D. Wash. Nov. 26, 2025). That is because, “[I]n immigration court, custody
20 hearings are routine and impose a minimal cost.” *Carballo v. Andrews*, No. 1:25-CV-
21 00978-KES-EPG (HC), 2025 WL 2381464, *8 (E.D. Cal. Aug. 15, 2025).

22 Thus, Mr. Suong had a right to a hearing before being re-detained, yet none
23 occurred. Because he was denied that hearing, he must be released on this ground as
24 well. That does not prevent Respondents from re-detaining him if a hearing should
25 establish, based on new facts, that he has violated the conditions the Court imposes (or
26 that Respondents impose at the Court’s direction).

1 As with the *Zadvydas* issue, Mr. Suong's criminal history is not relevant to the
2 separate due process issue. That history was fully known to Respondents at the time
3 they released him on his 2021 Order of Supervision. And in fact Respondents seek to
4 justify his recent re-detention only on the basis of their "individualized determination
5 that Petitioner could now be removed to Cambodia," dkt. 14 at 8, which was discussed
6 above. Notably, they make no claim that Mr. Suong violated any of the conditions of
7 his Order of Supervision during the four years he was released.

8 **IV. RESPONDENTS HAVE NOT SHOWN COMPLIANCE WITH THEIR**
9 **REGULATIONS REGARDING RE-DETENTION.**

10 As discussed in Mr. Suong's petition at 11-13, various regulations govern re-
11 detention. Respondents have not addressed that requirement at all in their Response.
12 Those "regulations appear to require an individualized determination about the
13 likelihood of removal based on changed circumstances, followed by notice and an
14 opportunity to respond." *Phetsadakone v. Scott*, No. 2:25-CV-01678-JNW, 2025 WL
15 2579569, at *3 (W.D. Wash. Sept. 5, 2025). Although Respondents assert they made
16 the individualized determination, there is nothing in the record attesting that
17 Respondents provided Mr. Suong with notice or an opportunity to respond.

18 These regulations also require Respondents to establish that, based on "changed
19 circumstances," there is "a significant likelihood that the [noncitizen] may be removed
20 in the reasonably foreseeable future," 8 C.F.R. § 241.13(i)(2); *see also, e.g.,*
21 *Hernandez-Escalante v. Noem, et al.*, No. CV25-182-MJT, 2025 WL 2206113, at *3
22 (E.D. Tex. Aug. 2, 2025) ("These regulations clearly indicate, upon revocation of
23 supervised release, it is the [Government's] burden to show a significant likelihood that
24 the [noncitizen] may be removed.") (collecting cases). As discussed in Part I,
25 Respondents have not met that burden. *See Tran v. Bondi*, No. C25-01897-JLR, 2025
26 WL 3140462, at *3 (W.D. Wash. Nov. 10, 2025) (finding that Respondents did "not

1 met [their] burden to present evidence supporting” their claim of removal within
 2 reasonably foreseeable future and therefore did “not comply with the requirements set
 3 forth by 8 C.F.R. § 241.13(i) and 8 C.F.R. § 241.13(f)”.

4 On two separate regulatory grounds (failure to provide notice and opportunity to
 5 respond; failure to meet their burden), Mr. Suong’s re-detention was unlawful, in
 6 addition to his *Zadvydas* and due process claims.

7 **V. AS NUMEROUS COURTS HAVE HELD, AND CONTRARY TO THE**
 8 **GOVERNMENT’S CONTENTION (WHICH IS UNSUPPORTED BY**
 9 **ANY ON-POINT AUTHORITY), MR. SUONG’S CLAIMS REGARDING**
 10 **REMOVAL TO A THIRD COUNTRY ARE RIPE.**

11 Mr. Suong requested an order precluding ICE from removing him to a third
 12 country pursuant to its punitive removal policies and an order precluding removing him
 13 to a third country absent notice and a meaningful opportunity to respond. Respondents
 14 assert, without citation to any on-point legal authority, that this Court should deny Mr.
 15 Suong’s request as not being ripe. Dkt. 14 at 9-10. A similar argument was rejected in
 16 *Nguyen*, 2025 WL 2419288, at *13. There, the government also represented that it was
 17 seeking only to remove the petitioner to his home country of Vietnam and even
 18 stipulated that it would not attempt to remove him to any other country unless Vietnam
 19 rejected him. 2025 WL 2419288, at *27. The court was unpersuaded, explaining that
 20 “the Ninth Circuit has found such voluntary promises insufficient” to eliminate the
 21 potential irreparable injury that petitioner could face if the promise were withdrawn,
 22 particularly given the underlying allegations that third party removals were being
 conducted rapidly and without an opportunity for due process. *Id.* at *27–28.

23 And the court in *Louangmilith v. Noem, et al.*, No. 25-cv-2502-JES-MSB, 2025
 24 WL 2881578 (S.D. Cal. Oct. 9, 2025), rejected the government’s exact argument here
 25 that “this situation is not ripe for adjudication because ICE is not seeking to remove
 26 Petitioner to a third country.” *Id.* at *4. Despite the government’s representations, the

1 court, citing *Nguyen*, stated it was “more persuaded by Petitioner’s arguments” that “by
2 the time [the claims] are ripe by the government’s argument, it will be too late for the
3 individuals to meaningfully challenge the removal.” *Id.* (granting petition on claim that
4 ICE should be prevented from removing petitioner to a third country without due
5 process). *See also Hambarsonpour v. Bondi*, No. C25-1802-RSM, 2025 WL 3251155,
6 at *5 (W.D. Wash. Nov. 21, 2025) (rejecting government’s ripeness argument).

7 In addition, the events cited in Mr. Suong’s petition, dkt. 1 at 16-19, which
8 Respondents do not deny, demonstrate that the government has undertaken rapid and
9 punitive third-country removals without even the process required by its own
10 regulations. This further shows that such an action against him is sufficiently likely to
11 make the matter ripe.

12 Respondents have provided no substantive response to Mr. Suong’s petition
13 regarding the illegality of their policies of third country removal and have therefore
14 waived the issue.

15 This Court should grant the two forms of relief Mr. Suong requested regarding
16 third country removal. *See Abubaka*, 2025 WL 3204369, at *7-8, 2025) (ruling in
17 petitioner’s favor on merits third country removal as to both due process and punitive
18 nature of removal).

19 VI. CONCLUSION

20 The Court should grant Mr. Suong’s petition on all grounds and grant the
21 requested relief, including his immediate release. *See* dkt. 1 at 25-26. The Court should
22 also adopt the approach taken by Judge Robert S. Lasnik recently, and further order that
23 “Respondents may not re-detain petitioner unless:

- 24 a. [He] violates a condition of [his] Order of Supervision; or
 - 25 b. The government
- 26

1 (1) obtains a valid travel document to [Cambodia or Thailand] for [him],
2 (2) provides the valid travel document to [him and his] counsel,
3 (3) offers petitioner the opportunity to leave on [his] own within two
4 months, and
5 (4) petitioner does not leave. Under such circumstances, the government
6 may be permitted to re-detain petitioner provided it has already made
7 concrete arrangements for [him] to be put on a flight to [Cambodia or
8 Thailand] in the reasonably foreseeable future.”

9 *See Do v. Scott*, No. C25-2187RSL, 2025 WL 3496909, at *6 (W.D. Wash. Dec. 5,
10 2025).

11 DATED this 8th day of December 2025.

12 Respectfully submitted,

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14 *s/ Alan Zarky*
15 Staff Attorney
16 Attorney for Sokha Suong
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