



25cv02339

**UNITED STATES DISTRICT COURT**

**WESTERN DISTRICT OF WASHINGTON**

**AT TACOMA**

FILED	LOGGED
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DEC 22 2025	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

**MUHAMMAD ZAHID CHAUDHRY,**

Petitioner,

v.

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

Respondents.



**\*NON-DETAINED\***

Case No. 2:25-cv-02339-DGE-  
MLP

**MOTION TO ENFORCE AND  
CLARIFY THE COURT'S  
ORDER GRANTING HABEAS  
RELIEF**

**I. INTRODUCTION**

Petitioner respectfully moves the Court to enforce and clarify its December 22, 2025 Order Granting the Petition for Writ of Habeas Corpus (Dkt. 48), following Respondents' immediate imposition of onerous supervision conditions that threaten to circumvent both the letter and the spirit of the Court's ruling.



Although the Court ordered Petitioner's release and expressly prohibited re-detention absent written notice and an opportunity to respond, Respondents have required Petitioner—within hours of release—to sign an Order of Supervision mandating in-person reporting at the same ICE facility where he was unlawfully seized, enrollment in an Alternatives to Detention (“ATD”) program, and submission to GPS ankle monitoring, all without individualized findings, explanation, or process.

Petitioner does not seek to relitigate the merits of the habeas petition. He seeks only to ensure that Respondents comply with the Court's release order and do not accomplish through coercive supervision what the Court squarely held they may not do through detention.

## **II. RELEVANT BACKGROUND**

On December 22, 2025, this Court granted Petitioner's writ of habeas corpus and ordered his immediate release from custody. The Court held that Petitioner's detention violated the Fifth Amendment's Due Process Clause and was unauthorized as a matter of law.



Critically, the Court further ordered:

**“Absent an order from the Ninth Circuit lifting the stay of removal, Petitioner may not be re-detained until after he is provided written notice of the basis for revoking his release along with an appropriate opportunity to respond to notice.”**

Later that same day, ICE released Petitioner—but only after compelling him to sign a pre-printed **Order of Supervision (Form I-220B)** dated December 22, 2025. That order requires, among other things:

- In-person reporting on December 29, 2025 at the ICE Seattle ERO office located at **12500 Tukwila International Boulevard**;
- Mandatory enrollment and “successful participation” in the **Alternatives to Detention (ATD)** program;
- Exposure to **electronic GPS ankle monitoring**, curfew, and re-arrest for alleged noncompliance.

ICE imposed these conditions without:

- any written findings of danger or flight risk,



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- any explanation of necessity,
- any notice of intent to revoke release, and
- any opportunity for Petitioner to respond.

### **III. THE COURT RETAINS AUTHORITY TO ENFORCE ITS HABEAS ORDER**

A district court retains inherent authority to enforce and clarify its own judgments, including habeas release orders. Where, as here, the challenged conduct directly implicates compliance with the Court's release directive, enforcement jurisdiction is proper even absent an explicit retention clause.

Respondents cannot evade judicial review by nominally "releasing" Petitioner while subjecting him to coercive restraints that functionally undermine the Court's ruling.

### **IV. ICE'S ACTIONS RISK CIRCUMVENTING THE COURT'S ORDER**



This Court recognized that Petitioner has a substantial liberty interest in remaining free from custody and coercive restraint, particularly given his uninterrupted compliance with government requirements for more than seventeen years.

The conditions imposed by ICE immediately upon release raise serious concerns, particularly given Petitioner's documented history of trauma and post-traumatic stress disorder (PTSD) associated with his prior unlawful seizure and detention:

**1. Functional Re-Detention Through Supervision**

Mandatory in-person reporting at the site of prior unlawful seizure, coupled with GPS ankle monitoring, imposes custodial restraints approaching detention—without the notice or opportunity to respond the Court expressly required.

**2. Lack of Individualized Justification**

The Court found no evidence that Petitioner presents a flight risk or danger to the community. ICE has articulated no contrary basis.

**3. Chilling, Coercive, and Traumatizing Effect**

Requiring Petitioner to return in person to the precise ICE facility at which he was unlawfully seized and detained creates not only a chilling and



coercive effect, but a concrete psychological harm. Petitioner suffers from serious trauma and post-traumatic stress disorder associated with his detention at this location—a facility widely known within this District for unlawful and constitutionally deficient seizure practices. Compelling in-person reporting under threat of arrest at this site is neither necessary nor benign; it predictably retraumatizes Petitioner, undermines the liberty the Court restored, and functions as punitive restraint without due process. Telephonic or remote reporting is more than sufficient to serve any legitimate governmental interest without inflicting further constitutional injury, and the refusal to permit such an accommodation is inconsistent with the Court’s remedial intent and due process principles.

Petitioner does not contend that all supervision is per se unlawful. He contends that **punitive, unexplained, and detention-adjacent conditions imposed immediately after a habeas victory are inconsistent with the Court’s order and constitutional safeguards.**

#### **V. REQUESTED RELIEF**

Petitioner respectfully requests that the Court:



- 1. Clarify that Respondents may not impose GPS ankle monitoring, ATD enrollment, or in-person reporting requirements absent written, individualized justification consistent with due process;**
- 2. Order that any reporting requirements, if permitted, be conducted remotely or at a neutral location not associated with prior unlawful detention;**
- 3. Confirm that Respondents may not re-detain Petitioner or escalate supervision conditions without first providing written notice and an opportunity to respond, as required by the Court's December 22, 2025 Order, despite their threatening assertions to the contrary;**
- 4. Grant such other relief as the Court deems just and proper to ensure compliance with its habeas ruling.**

## **VI. CONCLUSION**



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This Court's habeas order was clear: Petitioner's liberty may not be revoked or constrained without due process. ICE's immediate imposition of coercive supervision conditions threatens to nullify that ruling in practice.

Petitioner respectfully asks the Court to enforce its order and ensure that the relief granted is real, not illusory.

DATED: December 22, 2025

Respectfully submitted,

/s/ Muhammad Zahid Chaudhry, 

Petitioner

Dated: 12/22/2025

*Filed without waiver of any rights or remedies.*





DEPARTMENT OF HOMELAND SECURITY  
U.S. Immigration and Customs Enforcement  
**ORDER OF SUPERVISION (ADDENDUM)**

File No.: 

Date: December 22, 2025

Name: CRAUDERY, MUHAMMAD ZAHID

- That you do not associate with know gang members, criminal associates, or be associated with any such activity.
- That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- That you do not commit any crimes while on this Order of Supervision.
- That you report to any parole or probation officer as required within 6 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- Any violation of the above conditions will result in revocation of your employment authorization document.
- Any violation of these conditions may result in you being taken into Service custody and you being criminally prosecuted.
- Other:

X \_\_\_\_\_  
Alien's Signature

U.S. Department of Homeland Security

Continuation Page for Form I-220B

Alien's Name CHAUDHRY, MUHAMMAD ZAHID	File Number <del>XXXXXXXXXX</del> Event No: <del>XXXXXXXXXX</del>	Date 12/22/2025
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LOCATION OF ICE OFFICE WHICH YOU REPORT TO  
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12500 Tukwila International Boulevard  
Seattle, WA 98168

Signature BRITT JR, HAROLD	Title Deportation Officer
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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

**CERTIFICATE OF SERVICE**

I certify that on December 5, 2025, I caused to be served true and correct copies of the MOTION TO ENFORCE AND CLARIFY THE COURT'S ORDER GRANTING HABEAS RELIEF by U.S. Postal Service First Class Mail upon the following parties pursuant to Fed. R. Civ. P. 4(i) and Local Civil Rule 4.1:

**1. Warden Bruce Scott**

Northwest ICE Processing Center  
1623 East J Street  
Tacoma, WA 98421

**2. Laura Hermosillo**

Field Office Director, ICE Enforcement & Removal Operations – Seattle  
ICE ERO Seattle Field Office  
815 Airport Way S  
Seattle, WA 98134

**3. Kristi Noem**

Secretary of Homeland Security  
U.S. Department of Homeland Security  
2707 Martin Luther King Jr Ave SE  
Washington, DC 20528-0615



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**4. U.S. Department of Homeland Security**

Office of the General Counsel

U.S. Department of Homeland Security

2707 Martin Luther King Jr Ave SE

Washington, DC 20528

**5. Pamela Bondi**

Attorney General of the United States

U.S. Department of Justice

950 Pennsylvania Ave NW

Washington, DC 20530

**6. United States of America (Local Service)**

Civil Process Clerk

United States Attorney's Office

Western District of Washington


700 Stewart Street, Suite 5220

Seattle, WA 98101

Service was completed by depositing each mailing with the U.S. Postal Service.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 22nd day of December, 2025, at Tacoma, Washington.

/s/ Muhammad Zahid Chaudhry ()

2420 Angela St SE

Lacey, WA 98503