

District Judge Tana Lin  
Magistrate Judge Michelle L. Peterson

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Petrona TOMAS MANUEL et al.,

Petitioners,

v.

Laura HERMOSILLO et al.,

Respondents.

Case No. 2:25-cv-2353-TL-MLP

**PETITIONERS' REPLY IN  
SUPPORT OF MOTION TO ISSUE  
ORDER TO SHOW CAUSE AND  
EXPEDITED BRIEFING  
SCHEDULE**

Respondents' request for 20 days to file a return "because the return period will include the Thanksgiving holiday," Dkt. 11 at 2, ignores the ongoing harm to Petitioners while they remain unlawfully detained, separated from their community during the holiday. *Cf. Pinchi v. Noori*, 792 F. Supp. 3d 1025, 1035 (N.D. Cal. 2025) ("[E]ven the two-day curtailment of liberty . . . already suffered upon her re-detention by ICE was not justified by any valid interest."). Respondents urge the Court to exercise discretion, Dkt. 11 at 2, but fail to address the long-established understanding of habeas as "a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noka*, 372 U.S. 391, 400 (1963), *overruled on other grounds*, *Wainwright v. Sykes*, 433 U.S. 72 (1977), as well as this Court's recent orders, see Dkt. 2 at 1.

1 Furthermore, Respondent's unsupported assertion that they need "additional time" to  
2 independently assess "five separate A-files," *see* Dkt. 11 at 2, is misguided as a practical matter.  
3 The central issue presented is whether Respondents provided Petitioners with written notice and  
4 a hearing before a neutral decisionmaker prior to their re-detention. *See* Dkt. 1 ¶¶ 94–97.  
5 Respondents' motion does not refute that they are in possession of Petitioners' files; nor does it  
6 assert any difficulty in ensuring Respondents' counsel's access to those files. Given the  
7 significant liberty interest at stake, seven days is a reasonable time for Respondents to review the  
8 records relating to each Petitioner's apprehension and file their return.

9 Ms. Escorela, Ms. Choello, Ms. Tomas, Mr. Martinez, and Mr. Navarrete have  
10 respectively been held at the NWIPC in violation of their procedural due process rights since  
11 October 3, October 20, October 28, October 28, and November 4, 2025. *See* Dkt. 1 ¶¶ 30, 38, 51,  
12 69, 78, 81–97. In light of their ongoing confinement, Petitioners respectfully request that the  
13 Court issue an order to show cause and an expedited briefing schedule as proposed at Dkt. 2-1.

14 Respectfully submitted this 24th day of November, 2025.

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**WORD COUNT CERTIFICATION**

I, Leila Kang, certify that this reply contains 329 words, in compliance with the Local Civil Rules.

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