

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' RESPONSE TO
THE REPORT AND
RECOMMENDATION**

Note on Motion Calendar:
December 31, 2025

Petitioners do not object to the December 10, 2025 Report and Recommendation (R&R),
Dkt. 18, and Respondents have confirmed that they will not be filing objections, *see* Dkt. 19.
Accordingly, this matter is now fully submitted for the District Judge's consideration. Petitioners
therefore respectfully ask the Court to immediately adopt the R&R in its entirety and grant their
petition for a writ of habeas corpus without further delay.

Respectfully submitted this 15th day of December, 2025.

s/ Matt Adams
Matt Adams, WSBA No. 28287
matt@nwirp.org

s/ Leila Kang
Leila Kang, WSBA No. 48048
leila@nwirp.org

1 s/ Glenda M. Aldana Madrid
Glenda M. Aldana Madrid,
2 WSBA No. 46987
glenda@nwirp.org

s/ Aaron Korthuis
Aaron Korthuis, WSBA No. 53974
aaron@nwirp.org

3
4 s/ Amanda Ng
Amanda Ng, WSBA No. 57181
amanda@nwirp.org

5
6 NORTHWEST IMMIGRANT RIGHTS
PROJECT
7 615 Second Ave., Suite 400
Seattle, WA 98104
(206) 957-8611

8 *Counsel for Petitioners*

9
10 **WORD COUNT CERTIFICATION**

11 I, Amanda Ng, certify that this notice contains 68 words, in compliance with the Local
12 Civil Rules.

13 s/ Amanda Ng
Amanda Ng, WSBA No. 57181
14 Northwest Immigrant Rights Project
615 Second Ave., Ste 400
15 Seattle, WA 98104
(206) 816-3897
16 amanda@nwirp.org