

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JIANMEI CAO,

Petitioner,

v.

Bruce SCOTT, Warden, Northwest ICE
Processing Center; Camilla WAMSLEY,
Enforcement and Removal Operations,
Seattle Field Office Director, U.S.
Immigration and Customs Enforcement;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT
OF HOMELAND SECURITY; Todd
LYONS, Acting Director and Senior Official
Performing Duties of Director of ICE U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Respondents.

Civil Case No.: 25-cv-02373-RSM-GJL

**STIPULATION REGARDING
BRIEFING SCHEDULE, THIRD
COUNTRY REMOVAL AND FACILITY
TRANSFER [PROPOSED ORDER]**

Petitioner Jianmei Cao filed a habeas corpus petition challenging her detention at the Northwest ICE Processing Center and seeking an injunction against third country removal. Dkt. 4. The parties have met and conferred on a briefing schedule, and whether Respondents will agree to not remove Petitioner to a third country or transfer her to another immigration facility while this litigation is pending.

Petitioner and Federal Respondents hereby jointly stipulate as follows:

Briefing Schedule:

Respondents will file their return on the habeas by December 5, 2025.

Petitioner will file her reply by December 8, 2025.

Facility Transfer:

ICE agrees not to transfer Petitioner to another facility while this litigation is pending.

Repatriation Efforts to China:

Petitioner agrees to complete all China Travel Document requests and assist with removal efforts to China.

ICE agrees to include counsel for Petitioner by phone or in person and a human interpreter qualified in the Mandarin language for any meeting between ICE officers and Petitioner regarding completing her travel document request and/or her repatriation to China. If counsel is included in the call, counsel agrees not to interject or interfere with any conversations.

Third Country Removal:

ICE agrees that it is only seeking to remove her to China and will not pursue third country removal during the pendency of this litigation.

DATED this 26th day of November, 2025.

Respectfully submitted,

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Attorneys for Federal Respondents

I certify that this memorandum contains 215 words, in compliance with the Local Civil Rules.

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Attorneys for Petitioner

[PROPOSED] ORDER

The parties are ORDERED to:

Briefing Schedule:

Respondents will file their return on the habeas by December 5, 2025.

Petitioner will file her reply by December 8, 2025.

Facility Transfer:

ICE will not to transfer Petitioner to another facility while this litigation is pending.

Repatriation Efforts to China:

Petitioner will complete all China Travel Document requests and assist with removal efforts to China.

ICE will include counsel for Petitioner by phone or in person and a human interpreter qualified in the Mandarin language for any meeting between ICE officers and Petitioner regarding completing her travel document request and/or her repatriation to China. If counsel is included in the call, counsel will not to interject or interfere with any conversations.

Third Country Removal:

ICE will not seek to remove Petitioner to China and will not pursue third country removal during the pendency of this litigation.

DATED this ____ day of _____, 2025.

RICARDO MARTINEZ
United States District Judge