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6 Attorney for Petitioner

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON

9 Miguel Angel LOPEZ-Lugo

10 Petitioner,

11 v.

12 Cammilla WAMSLEY, Seattle Field Office
13 Director, Enforcement and Removal Operations,
14 United States Immigration and Customs
15 Enforcement (ICE); Bruce SCOTT, Warden,
16 Northwest ICE Processing Center; Kristi
17 NOEM, Secretary, United States Department of
18 Homeland Security; Pamela BONDI, United
19 States Attorney General; UNITED STATES
20 DEPARTMENT OF HOMELAND
21 SECURITY;

22 Respondents.
23

Case No. 2:25-cv-25-2380

**TRAVERSE IN SUPPORT OF
PETITION FOR WRIT OF HABEAS
AND RESPONSE TO ANSWER**

Noting Date: December 3, 2025

1 In their reply the Respondents argue that Mr. Lopez has not exhausted his administrative
2 remedies by attempting to get bond from the Tacoma Immigration Court. However, countless cases
3 before this Court show that such a request would be futile as the Executive Office of Immigration
4 Reform (EOIR) continues to deny bond for all *Rodriguez Vasquez* class members. *See, e.g. Mendoza*
5 *Ariaza v. Wamsley*, No. 2:25-cv-2139 (W.D. Wash), *Ortiz Martinez v. Wamsley*, 2:25-cv-1822 (W.D.
6 Wash.), *Garcia v. Wamsley*, No. 2:25-cv-01980 (W.D. Wash.).

7 Simply stated, the Tacoma Immigration Court will undoubtedly deny Mr. Lopez's bond on
8 jurisdictional grounds, citing *Matter of Yajure Hurtado* unless this Court grants the habeas petition and
9 orders the Immigration Court to do otherwise.

10 The Respondents do not challenge Mr. Lopez's class membership and as such this Court
11 should order that Mr. Lopez be granted a bond hearing as soon as possible or be released in the
12 alternative.

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15 Dated: 12/3/25

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