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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

JOSE LABRADOR ABADIN,

Petitioner,

v.

KRISTI NOEM, Secretary for the
Department of Homeland Security; TODD
LYONS, Acting Director, Immigration and
Customs Enforcement; CAMILLA
WAMSLEY, Field Office Director,
Immigration and Customs Enforcement
Seattle Field Office; BRUCE SCOTT,
Warden, Northwest ICE Processing Center,

Respondents.

Case No.

Agency No. 

**PETITION FOR WRIT OF HABEAS
CORPUS UNDER 28 U.S.C. § 2241**

INTRODUCTION

1. Petitioner is native and citizen of Cuba who lawfully entered the United States on April 19, 2021, via a CBP One mobile app paroled entry made under 8 U.S.C. § 1182(d)(5). *See also* 8 C.F.R. § 212.5. He was then placed in non-detained immigration proceedings under 8 U.S.C. § 1229a and was awaiting an initial hearing in immigration court. In July of 2025, he filed an application to adjust his status under the Cuban Refugee Adjustment Act and established prima facie eligibility for the benefit. Nonetheless, after committing no crimes nor failing to attend any scheduled immigration court hearings, he was arrested in Portland, Oregon on November 16, 2025, with federal agents physically pulling him from his girlfriend's vehicle, which he had permission to drive. He was never shown a valid warrant at the time of his arrest and was later presented with a blank, fillable DHS form with the word "warrant" scrawled onto it with a pen. Petitioner further alleges that his hands were struck with a nightstick or baton during his apprehension. He was given no reason for the necessity of his arrest and is now detained in the Northwest ICE Processing Center in Tacoma, Washington. A writ of habeas corpus is necessary and proper given the facts of this case.

PARTIES

2. Petitioner, Mr. Jose Labrador Abadin, is a Cuban citizen currently held in custody at the Northwest ICE Processing Center in Tacoma, Washington.

3. Respondent, Ms. Kristi Noem, is sued in her official capacity as the Secretary of the Department of Homeland Security ('DHS'). She is sued as the cabinet-level secretary responsible for all immigration enforcement in the United States.

4. Respondent, Mr. Todd Lyons, is sued in his official capacity as the Acting Director of Immigration and Customs Enforcement (“ICE”), which is responsible for all immigration enforcement in the United States.

5. Respondent, Ms. Camilla Wamsley, is sued in her official capacity as the Field Office Director of Seattle's ICE Field Office, which is responsible for the apprehension, detention, and removal of noncitizens within the Field Office's jurisdiction. She is the immediate legal custodian of the Petitioner for purposes of a federal habeas petition.

6. Respondent, Mr. Bruce Scott, is sued in his official capacity as the Warden of the Northwest ICE Processing Center, the privately-operated immigration detention facility where Petitioner is being held in federal custody. He exercises direct custody over the Petitioner.

JURISDICTION

7. This action arises under the Constitution of the United States and the Immigration and Nationality Act (“INA”). 8 U.S.C. § 1101 et. seq.; *see also Reno v. Flores*, 507 U.S. 292, 306 (1993) (affording immigrants Due Process under the Fifth Amendment).

8. The Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

9. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq., and the All Writs Act, 28 U.S.C. § 1651.

VENUE

10. Venue is appropriate under 28 U.S.C. § 1391(e)(1) as the Petitioner is detained in this judicial district.

11. For these same reasons, divisional venue is proper under Local Rule 3-2.

FACTUAL ALLEGATIONS

12. Petitioner initially attempted to enter the United States on December 14, 2020, through the U.S.-Mexico border. He sought protection after experiencing physical mistreatment by the Cuban government. At the time, the Department of Homeland Security (“DHS”) was utilizing a program named “Migrant Protection Protocols” (aka “MPP,” better known as the “Remain in Mexico” policy). Petitioner, who was then residing in Colonia Satelite Jaurez, Chihuahua, was issued a Notice to Appear (“NTA”) in immigration court and waited in Mexico until being granted a paroled entry through the CBP One mobile app created by DHS. He was paroled into the United States on April 19, 2021.

13. DHS has not amended its NTA since Petitioner’s parole entry, but he is likely to be classified as an arriving alien under 8 U.S.C. §1225(b)(2)(A).

14. Petitioner then established a residence at 2312 W La Salle St., Tampa, FL 33607. Although his parole period expired on April 17, 2022, he was still awaiting an initial master calendar hearing with the Orlando Immigration Court. The immigration court continually canceled Petitioner’s scheduled hearings, which was common during the era of the COVID-19 pandemic. He was unrepresented by counsel until the undersigned entered his appearance in the Tacoma Immigration Court on November 24, 2025.

1 15. On July 3, 2025, Petitioner lawfully applied to adjust his status under the Cuban
2 Refugee Adjustment Act (“CAA”). *See* PL 89-732, 80 Stat. 1161 (Nov. 2, 1966); PL 96-422,
3 94 Stat. 1810 (Oct. 10, 1980) (referring to Cuban nationals as being paroled in a “special
4 status”). To be eligible for this benefit, U.S. Citizenship and Immigration Services (“USCIS”)
5 requires that an applicant be (1) a native or citizen of Cuba, (2) inspected and admitted or
6 paroled into the U.S. after January 1, 1959, (3) not inadmissible to the United States under 8
7 U.S.C. § 1182, (4) physically present at the time of filing Form I-485, (6) physically present for
8 at least one year before filing Form I-485, and (7) one who has properly filed their application
9 to adjust status¹. Petitioner’s first I-485 was rejected, but his second submission was received
10 on July 25, 2025. His fingerprints were captured for biometric purposes on August 21, 2025.

11 16. In mid-2025, Petitioner established a long-distance romantic relationship with a
12 woman living in Portland, Oregon. In September of this year, he moved to Portland to be with
13 his new girlfriend.

14 17. Since his April 2021 entry, Petitioner has had no criminal arrests or incidents in
15 the United States.

16 18. On November 16, 2025, Petitioner was driving his girlfriend’s vehicle with a
17 valid Oregon driver license. He was stopped by what he believed to be local police but in
18 reality were DHS agents. Petitioner was initially told he was free to leave after showing his
19 license, but the agents changed course soon after, without explanation, and physically removed
20 him from the vehicle. Petitioner states that he did show the agents his I-485 receipt notice,
21 proving that he had a pending application for permanent residency, and further states he was not
22 shown a valid administrative warrant at the time of his arrest. He was then sat in the back of

23 _____
24 ¹ <https://www.uscis.gov/green-card/green-card-eligibility/green-card-for-a-cuban-native-or-citizen>

1 several different vehicles, and after asking repeatedly to see a warrant, was at one point shown a
2 blank, fillable form with the word “warrant” written onto it with a pen. This writing took place
3 in front of Petitioner.

4 19. Petitioner further asserts that at no point was he shown a paper with either his or
5 his girlfriend’s names printed onto it. When he panicked and tried to explain that he has a U.S.
6 citizen daughter, one agent struck his hands with a baton or nightstick.

7 20. Petitioner was eventually transported to the Northwest ICE Processing Center in
8 Tacoma, Washington, where he remains today. He was given no discernable reason by DHS
9 officials as to why he should be detained when he has no criminal arrests, had been lawfully
10 paroled into the United States, has not missed any hearings in immigration court, and is the
11 beneficiary of a prima facie approvable application for permanent residency under the CAA.

12
13 **REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243**

14 21. The Court must grant a petition for writ of habeas corpus or issue an order to
15 show cause (“OSC”) to the Respondents “forthwith,” unless the Petitioner is not entitled to
16 relief. 28 U.S.C. § 2243. If an OSC is issued, the Court requires that Respondents file a return
17 “within three days unless for good cause for additional time, not exceeding twenty days, is
18 allowed.” *Id.*

19 22. Courts have long recognized the significance of the habeas statute in protecting
20 individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most
21 important writ known to the constitutional law of England, affording as it does a swift and
22 imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391,
23 400 (1963).

23. Petitioner is “in custody” for the purpose of § 2241 because he is currently detained at the Northwest Detention Center. “[T]he Supreme Court has repeatedly held that the in-custody requirement [of 28 U.S.C. § 2241] is met where the Government restricts a petitioner’s freedom of action or movement,” including through an immigration order of supervision. *See Doe v. Barr*, 479 F. Supp. 3d 20, 26 (S.D.N.Y. 2020), *citing Jones v. Cunningham*, 371 U.S. 236 (1963) and *Spencer v. Kemna*, 523 U.S. 1, 7 (1998); *see also, e.g., Devitri v. Cronen*, 290 F. Supp. 3d 86, 90 (D. Mass. 2017) (finding the same); *Alvarez v. Holder*, 454 F. App’x 769, 772-72 (11th Cir. 2011) (same).

LEGAL FRAMEWORK

24. Noncitizens in immigration proceedings are entitled to Due Process under the Fifth Amendment of the U.S. Constitution. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2011). This concept specifically extends to the indefinite detention of aliens. *Id.*

25. The Immigration and Nationality Act (“INA”) establishes various justifications for the detention of noncitizens, pending a decision on whether they are to be removed. *See* 8 U.S.C. § 1226(a).

26. Removal proceedings, as described in U.S.C. § 1229a, are used to determine whether noncitizens should be removed from the United States.

27. Immigration detention is a form of civil confinement that “constitutes a significant deprivation of liberty that requires due process protection.” *Addington v. Texas*, 441 U.S. 418, 4253 (1979).

28. Custody determinations for “arriving aliens” in removal proceedings are, in part, governed by 8 U.S.C. § 1225. Under 8 U.S.C. §1225(b)(2)(A), an immigration judge has no

1 jurisdiction to issue a bond to an arriving alien. *See also* 8 CFR § 1003.19(h)(1)(i)(B).

2 However, DHS maintains authority to parole such persons from custody, as it regularly does
3 under 8 C.F.R. § 212.5(a)-(c) (*see also* 8 U.S.C. § 1182(d)(5)). This is precisely what was done
4 when Petitioner was paroled into the United States in April of 2021.

5 29. The regulation referenced at ¶ 28 states that an alien who presents neither a security
6 risk nor a risk of absconding may be paroled if their “continued detention is not in the public
7 interest as determined by [DHS officials]”. *Zadvydas*, 533 at 690; *Matter of Guerra*, 24 I&N
8 Dec. 37, 40 (BIA 2006). Here, Petitioner was (a) lawfully paroled into the United States, (b)
9 properly filed an application to register his permanent residence, and (c) has had no criminal
10 arrests or incidents giving rise to the notion that he is a danger to the community or a flight risk.
11 Although he overstayed his period of parole, he was properly waiting for an immigration court
12 hearing to be scheduled so that his removability from the United States could be established.

13 30. For the past four months, Petitioner has been waiting for the adjudication of
14 Form I-485, which USCIS exercises exclusive jurisdiction over. *See* 8 C.F.R. § 245.2(a)(1),
15 1245(a)(1)(ii); *Matter of Martinez-Montalovo*, 24 I&N Dec. 778 (BIA 2009) (confirming EOIR
16 CAA jurisdiction only for Cuban nationals admitted to the United States on a grant of advance
17 parole to pursue a previously filed application). He cannot pursue this form or relief through an
18 immigration court, and detained courts such as that in Tacoma are designed for the expedited
19 removal of noncitizens. If Petitioner is released from custody, there is little risk of him
20 absconding from ICE as he has a lawful and likely path toward permanent immigration status.

21 31. The Department of Homeland Security has not offered any form of explanation
22 as to why Petitioner’s continued detention or removal from the United States is in the
23 “continued interest of the United States.” The agency has apparently not conducted a “case-by-
24

1 case determination” regarding his custodial status, as it is required to by regulation.

2 32. A writ of habeas corpus is especially needed in this case since, as an “arriving
3 alien,” Petitioner is ineligible for receive a bond through an immigration judge. 8 U.S.C.
4 §1225(b)(2)(A).

5 33. Once a determination to release an individual from custody is made, the release
6 order may be revisited when the facts or circumstances warrant revocation or reconsideration.
7 8 U.S.C. § 1226(b).

8 34. Revocation and a return to custody are authorized only based on the
9 individualized facts and circumstances. 8 C.F.R. § 1236.1(c)(9). By regulation, revocation
10 decisions are limited in nature and may only be made by certain authorized officials. *Id.*

11
12 **CLAIMS FOR RELIEF**

13 **COUNT ONE**

14 **Violation of the Administrative Procedure Act**

15 **– 5 U.S.C. § 706(2)(A), 8 U.S.C. § 1226(b), and 8 C.F.R., § 1236.1(c)(9) –**

16 **Abuse of Discretion**

17 35. Petitioner restates and realleges all paragraphs as if fully set forth here.

18 36. Under the APA, a court shall “hold unlawful and set aside agency action” that is
19 an abuse of discretion. 5 U.S.C. § 706(2)(A).

20 37. An action is an abuse of discretion if the agency “entirely failed to consider an
21 important aspect of the problem, offered an explanation for its decision that runs counter to the
22 evidence before the agency, or is so implausible that it could not be ascribed to a difference in
23 view or the product of agency expertise.” *Nat’l Ass’n of Home Builders v. Defs. of Wildlife*, 551

1 U.S. 644, 658 (2007) (*quoting Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto.*
2 *Ins. Co.*, 463 U.S. 29, 43 (1983)).

3 38. To survive an APA challenge, the agency must articulate “a satisfactory
4 explanation” for its action, “including a rational connection between the facts found and the
5 choice made.” *Dep’t of Com. v. New York*, 139 S. Ct. 2551, 2569 (2019) (citation omitted).

6 39. By categorically revoking Petitioner’s freedom and bringing him into federal
7 custody, without consideration of the individualized facts and circumstances, Respondents have
8 violated the APA.

9 40. By continuing to detain Petitioner, Respondents have further abused their
10 discretion as there have been no changes to the facts or circumstances since the agency made its
11 recent determination to detain him.

12 41. Respondents have already considered Petitioner’s facts and circumstances in the
13 past, and determined then that he is neither a flight risk nor a danger to the community. The
14 DHS granted him humanitarian parole and authorized his travel to the United States; there have
15 been no subsequent changes since which justify the revocation of his freedom. Because
16 Petitioner has already been permitted to live in the United States – under the same facts that
17 existed in April of 2021, and which still very much exist – this would indicate that the
18 Respondents *still* do not consider him, on an individualized basis, to be a danger to the
19 community or a flight risk.

20 **COUNT TWO**

21 **Violation of the Administrative Procedure Act**

22 **– 5 U.S.C. § 706(2)(A), 8 U.S.C. § 1226(b), 8 C.F.R. § 1236.1(c)(9) –**

23 **Not in Accordance with Law and in Excess of Statutory Authority**

1 42. Petitioner restates and realleges all paragraphs as if fully set forth here.

2 43. Under the APA, a court “shall . . . hold unlawful . . . agency action” that is “not
3 in accordance with law;” “contrary to constitutional right;” “in excess of statutory jurisdiction,
4 authority, or limitations;” or “without observance of procedure required by law.” 5 U.S.C. §
5 706(2)(A)-(D).

6 44. 8 U.S.C. § 1226(b) authorizes that “[t]he Attorney General at any time may
7 revoke . . . parole authorized under 8 U.S.C. § 1226(a)” and rearrest a noncitizen under the
8 initial warrant. In implementing this statutory provision, 8 C.F.R. § 1236.1(c)(9) clarifies that
9 such revocations of release from custody may only be carried out in the “discretion of the
10 district director, acting district director, deputy district director, assistant district director for
11 investigations, assistant district director for detention and deportation, or officer in charge
12 (except foreign).”

13 45. It is a well-established administrative principle that “agency action taken without
14 lawful authority is at least voidable, if not void *ab initio*.” *L.M.-M. v. Cuccinelli*, 442 F. Supp.
15 3d 31, 35 (D.D.C. 2020), citing *SW General, Inc. v. NLRB*, 796 F.3d 67, 79 (D.C. Cir. 2015);
16 *see also Hooks v. Kitsap Tenant Support Servs., Inc.*, 816 F.3d 550, 555 (9th Cir. 2016)
17 (invalidating agency action because it was taken by unauthorized official).

18 46. Respondents have revoked Petitioner’s ability to live freely in the United States
19 because of a categorical policy prepared and implemented by government officials in
20 Washington, D.C., and not through the individual exercise of discretion required by law or the
21 persons enumerated by regulation to do so. This has been made clear by the lack of a valid
22 administrative warrant presented upon Petitioner’s arrest.

47. Respondents' detention of Petitioner is not in accordance with law and exceeds their statutory authority.

COUNT THREE

**Violation of the Fourth Amendment to the United States Constitution;
Unreasonable Seizure and Warrantless Arrest**

48. Petitioner restates and realleges all paragraphs as if fully set fourth here.

49. In *Vasquez Perdomo v. Noem*, --- F.Supp.3d ---, 2025 WL 1915964, at *17 (C.D. Cal. July 11, 2025), the U.S. District Court for the Central District of California explained why U.S.C. § 1252(b)(9) may not prevent all Fourth Amendment challenges to immigration detention. *See id.* (“*Sanchez* does not stand for the provision that all such constitutional claims may only be brought in removal proceedings . . . [t]his would mean that U.S. citizens – who Plaintiffs allege have also been unlawfully stopped, arrested, and detained – would have no venue to raise their claims.”) (citing *Sanchez v. Sessions*, 904 F.3d 643 (9th Cir. 2018)). The U.S. Supreme Court stayed the injunction in *Vasquez Perdomo*, but did so without explaining the basis for its ruling. *Noem v. Vasquez Perdomo*, 606 U.S. ___, 2025 WL 2585637 (Sept. 8, 2025). The jurisdictional question remains unsettled in the Ninth Circuit.

50. Except for at the border and its functional equivalents, the Fourth Amendment to the U.S. Constitution prohibits DHS from conducting a stop to question a person without first holding a reasonable suspicion that the individual is a noncitizen unlawfully present in the United States. *See* 8 U.S.C. §. 1357(a)(2), (c). Unlike illegal entry, unauthorized presence in the United States is not a crime. *Martinez-Medina v. Holder*, 673. F.3d 1029, 1036 (9th Cir. 2011) ("Nor is there any other federal criminal statute making unlawful presence in the United States, alone, a federal crime, although an alien's willful failure to register his presence

1 in the United States when required to do so is a crime, and other criminal statutes may be
2 applicable in a particular circumstance;") *aff'd by Hernandez v. Skinner*, 969 F.3d 930, 939-940
3 (9th Cir. 2020). Here, Petitioner's presence in the U.S. had been registered since his paroled
4 entry, and he attended one scheduled check-in with ICE while living in Tampa, Florida.
5 Petitioner lacks a criminal record, and to the extent that his partner may have had one, "[a]
6 person's mere propinquity to others independently suspected of [unlawful] activity does not,
7 without more, give rise to probable cause to search [or seize] that person." *Perez Cruz v. Barr*,
8 926 F.3d 1128, 1138 (9th Cir. 2019).

9 50. There were also no known traffic violations justifying Petitioner's stop. 8 C.F.R.
10 § 287.8(c)(2) may authorize DHS agents to briefly detain someone regarding their unlawful
11 presence, but here, Petitioner first offered a valid driver's license and, after his stop had become
12 abnormally long, proof that an application to register permanent status was pending. On their
13 own, his Hispanic appearance and/or accent are insufficient reasons to support a specific,
14 articulated, and particularized suspicion for his roadside detention. *See United States v. Manzo-*
15 *Jurado*, 457 F.3d 928, 934-35 (9th Cir. 2006) (explaining the reasonable suspicion standard for
16 believing a person is in the country illegally); *United States v. Brignoni-Ponce*, 422 U.S. 873,
17 886-87 (1975).

18 51. Similarly, the Fourth Amendment prohibits Respondents from making an arrest
19 without probable cause of unlawful presence. An arrest pursuant to a valid warrant is a defense
20 to Fourth Amendment violation, but there was no such warrant involved in this case. Petitioner
21 was cooperative, not engaging in suspicious behavior, and made no attempt to flee from the
22 arresting DHS agents. Only two days ago, the U.S. District Court for the District of Colorado
23 held that, even when there is "no doubt" that a person is unlawfully present in the United States,
24

1 a person may not be subject to arrest and detention without a warrant unless there is “reason to
2 believe” they will flee before one can be obtained. *Ramirez Ovando v. Noem*, --- F.3d ---, No.
3 1:25-cv-03183-RBJ at *52 (D. Colo. Nov. 25, 2025)². No other salient factors existed to
4 suggest that Petitioner might not be lawfully present in the United States. If he was detained
5 and arrested solely because of his ethnicity, both actions would constitute violations of the
6 Fourth Amendment.

7
8 **COUNT FOUR**

9 **Violation of the Fifth Amendment to the United States Constitution,**
10 **Right to Procedural Due Process**

11 52. Petitioner restates and realleges all paragraphs as if fully set forth here.

12 53. The Due Process Clause of the Fifth Amendment prohibits the federal
13 government from depriving any person of “life, liberty, or property, without due process of
14 law.” U.S. Const. Amend. V. Due process protects “all ‘persons’ within the United States,
15 including [non-citizens], whether their presence here is lawful, unlawful, temporary, or
16 permanent.” *Zadvydas*, 533 U.S. at 693.

17 54. Due process requires that government action be rational and non-arbitrary. *See*
18 *U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

19 55. While the government has discretion to detain individuals under 8 U.S.C. §
20 1226(a) and revoke custodial decisions under 8 U.S.C. § 1226(b), this discretion is not
21 “unlimited” and must comport with constitutional due process. *Zadvydas*, 533 U.S. at 698.

22
23

² Judge Jackson’s Order Granting Class Certification and a Preliminary Injunction is not net available on standard
24 legal research databases.

60. Transferring Petitioner outside of this judicial district, while he is pursuing a petition for writ of habeas corpus, would constitute a violation of the Fifth Amendment Right to Counsel.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

- 1) Assume jurisdiction over this matter;
- 2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;
- 3) Declare that Petitioner's arrest without reasonable suspicion or a warrant at time of arrest is violation of the Fourth Amendment;
- 4) Declare that Petitioner's detention without an individualized determination violates the Due Process Clause of the Fifth Amendment;
- 5) Declare that Petitioner's current detention was made in violation of statute and regulation;
- 6) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody;
- 7) Issue an Order prohibiting the Respondents from transferring Petitioner from the Northwest ICE Processing Center without first providing the Court, Petitioner, and Petitioner's counsel notice of the transfer within 48 hours' notice;
- 8) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- 9) Grant any further relief this Court deems just and proper.

Respectfully submitted,

Dated: November 27, 2025

s/ Benjamin Cornell
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VERIFICATION OF PETITIONER

On behalf of Jose Labrador Abadin, the party in custody, I verify the facts contained in the Petition for Writ of Habeas Corpus, upon information and belief and having reviewed the relevant records and pleadings. Mr. Labrador Abadin has not verified the petition himself as he is currently held in ICE custody.

November 27, 2025

s/ Benjamin Cornell

Date

Benjamin Cornell, WSBA 49553

CERTIFICATE OF SERVICE

The undersigned hereby certifies I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

US Attorneys
Email: usawaw.habeas@usdoj.gov

Dated: November 27, 2025 s/ Benjamin Cornell
Benjamin Cornell, WSBA 49553