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Attorney for Petitioner

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. 2:25-cv-02411-JLR

**MOTION FOR LEAVE TO ACCEPT
OVERSIZED TRAVERSE TO
FEDERAL RESPONDENT'S RETURN
MEMORANDUM**

Noted for Consideration: December 29,
2025

1 On December 23, 2025, the undersigned submitted a timely traverse to federal
2 Respondents' return memorandum on Mr. Labrador Abadin's petition for writ of habeas corpus.
3 Respondent's traverse was 3,809 words in length. Counsel has since realized this filing was
4 oversized, as Local Rule 7(e)(2) limits reply briefs to 2,100 words in length.

5 Counsel acknowledges that this Motion for Leave is not filed within three days prior to
6 the traverse's due date (*see* LCR 7(f)(1)), and apologizes for being unaware of the local civil
7 rules. However, a detailed response to the issues raised in the Respondents' return was
8 necessary, as issues not initially raised in Petitions' writ of habeas corpus merited a detailed
9 response. On this basis, he moves the Court to accept his traverse filed on December 23, 2025.

10
11 Respectfully submitted,

12 Dated: December 29, 2025

13 s/ Benjamin Cornell
14 BENJAMIN CORNELL, WSB #49533
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18 I certify that this memorandum conforms with the local rules as it is 276 words in length.
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