

District Judge Richard A. Jones
Magistrate Judge Brian A. Tsuchida

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON**

W- T- M, an adult,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case 2:25-cv-02428-RAJ-BAT

PETITIONER'S TRAVERSE

Noted for Consideration:
January 28, 2026

Expedited Review Requested

INTRODUCTION

Petitioner, W.T.M., through undersigned counsel, respectfully submits this Traverse to the Federal Respondents' Return filed on December 31, 2025. The Government's Return fails to justify Petitioner's ongoing, punitive detention. Contrary to the Government's assertions, this Court has full jurisdiction to review the lawfulness of Petitioner's custody, and the extraordinary circumstances of his arrest and the subsequent medical neglect require his immediate release.

Respondents' Return does not meaningfully defend the lawfulness of Petitioner's continued civil detention. Instead, it seeks to reframe serious government misconduct as legally irrelevant, to minimize the use of extreme force and subsequent medical neglect through generalized declarations, and to foreclose meaningful judicial review by mischaracterizing the nature of Petitioner's claims. The Court should decline that invitation.

Petitioner does not challenge the validity of removal proceedings, seek suppression of evidence, or pursue monetary relief. He challenges the ongoing legality of his detention, which was effectuated through excessive and unjustified force, compounded by deliberate deception, and rendered unconstitutional by continuing failures to provide adequate medical care, failures that impair his ability to meaningfully participate in his defense. These claims fall squarely within the core purpose of habeas corpus.

Respondents' jurisdictional, statutory, and factual arguments fail as a matter of law.

Accordingly, Petitioner, W.T.M., respectfully requests that this Court reject Respondents' Return and grant the Petition for Writ of Habeas Corpus. This Traverse is supported by the

1 pleadings and documents on file in this case, including Petitioner's Declaration, Declaration of
2 Olia M. Catala ("Catala Decl.") with exhibits attached thereto. Petitioner does not request an
3 evidentiary hearing and submits that the existing record is sufficient for the Court to determine
4 that his continued detention is unlawful and that immediate release is warranted.

5 ARGUMENT

6 I. This Court Has Jurisdiction Because Challenges to Detention are Independent of 7 Removal Orders.

8 The Government erroneously argues that 8 U.S.C. §§ 1252(a)(5) and 1252(b)(9) strip this
9 Court of jurisdiction. The Supreme Court has clarified that the "zipper clause" does not present a
10 jurisdictional bar where the parties are not asking for review of an order of removal, the decision
11 to seek removal, or the process by which removability is determined. *DHS v. Regents of the Univ.*
12 *of Cal.*, 591 U.S. 1, 19 (2020) (holding that INA § 242(b)(9) "does not present a jurisdictional
13 bar where the parties are not asking for review of an order of removal, the decision to seek
14 removal, or the process by which removability will be determined"). The Supreme Court
15 expressly held that this provision applies only to claims seeking review of the removal process
16 itself. *Jennings v. Rodriguez*, 583 U.S. 281 (2018). In this case, Petitioner does not challenge his
17 removability or administrative decision-making; he challenges the constitutionality of his
18 physical detention, a matter the Supreme Court has repeatedly recognized remains available for
19 habeas review. *Zadvydas v. Davis*, 533 U.S. 678 (2001). Petitioner's challenge is to the legal
20 validity of his physical confinement, a matter that is "collateral to, or independent of" the
21 removal process itself. *Kumarasamy v. U.S. Att'y Gen.*, 453 F.3d 169, 172 (3d Cir. 2006)

1 (holding that a habeas challenge to the legality of confinement is collateral to, and independent
2 of, the removal process and therefore not barred by jurisdiction-stripping provisions).

3 Additionally, the legislative history of the REAL ID Act explicitly states that it “*will not*
4 *preclude habeas review over challenges to detention that are independent of challenges to*
5 *removal orders.*” H.R. Rep. No. 109-72, at 175 (2005) (Conf. Rep.); *Ali v. Gonzales*, 421 F.3d
6 795, 797 n.1 (9th Cir. 2005). Because Petitioner challenges the constitutionality of his current
7 custody under 28 U.S.C. § 2241, and not a final order of removal, this Court’s jurisdiction
8 remains unimpaired. *INS v. St. Cyr*, 533 U.S. 289, 298–316 (2001); *Zadvydas v. Davis*, 533 U.S.
9 678, 687–88 (2001); *Demore v. Kim*, 538 U.S. 510, 517 (2003); *Singh v. Gonzales*, 499 F.3d 969,
10 976–81 (9th Cir. 2007).

11 Furthermore, Respondents’ contention that Petitioner’s conditions-of-confinement claims
12 are categorically barred from habeas review misstates the law and ignores the Supreme Court’s
13 preservation of the Writ to test the legality of physical custody. While Respondents cite *Pinson v.*
14 *Carvajal*, 69 F.4th 1059 (9th Cir. 2023) and *Badea v. Cox*, 931 F.2d 573 (9th Cir. 1991), to
15 suggest that claims concerning medical care must be pursued exclusively as civil rights actions,
16 they disregard the REAL ID Act’s legislative history, which explicitly provides that habeas
17 review remains available for challenges to detention that are independent of challenges to
18 removal orders. The abovementioned statutory “zipper clause” does not deprive courts of
19 jurisdiction where a petitioner challenges the physical legality of ongoing confinement, rather
20 than the validity of a removal order or the administrative process leading to removal. *Jennings v.*
21 *Rodriguez*, 583 U.S. 281, 307–08 (2018).

1 Here, Petitioner asserts that his detention is unconstitutionally punitive, following a
2 violent seizure—a dog attack causing “High” severity trauma, deep lacerations requiring sutures,
3 and ongoing internal rib pain—while Respondents continue to provide only minimal
4 over-the-counter medication. *See* Catala Decl., Exs. C, E. These facts demonstrate deliberate
5 indifference and render the confinement itself unlawful from its inception. Under *Bell v. Wolfish*,
6 441 U.S. 520, 539–40 (1979), civil detention becomes unconstitutional when it is excessive in
7 relation to its non-punitive purpose. Where conditions of confinement transform civil custody
8 into punitive restraint, outright release is the only adequate remedy. Habeas corpus under 28
9 U.S.C. § 2241 is the proper vehicle to challenge such unlawful restraint, and this Court retains
10 full jurisdiction to order Petitioner’s immediate release.

11 **II. Arrest-Related Misconduct and Resulting Medical Trauma are Cognizable Bases for**
12 **Habeas Relief as They Render Continuous Civil Confinement Unconstitutionally Punitive.**

13 Respondents argue that Petitioner’s allegations of constitutional and policy violations
14 during his arrest cannot support a habeas claim challenging the legality of his detention, but this
15 argument mischaracterizes both the nature of the claims and the scope of habeas jurisdiction. *See*
16 Dkt. 7 at 3. Habeas relief under 28 U.S.C. § 2241 turns on whether a petitioner “is in custody in
17 violation of the Constitution or laws or treaties of the United States,” and where unconstitutional
18 conduct during arrest results in serious injury compounded by ongoing medical neglect, that
19 conduct is directly relevant to whether continued civil confinement comports with due process.
20 *See* 28 U.S.C. § 2241(c)(3). The Constitution does not require courts to artificially sever the
21 violent manner in which custody was effectuated from the present legality of that custody.

1 Furthermore, under the Accardi doctrine, agencies must follow their own rules. *United*
2 *States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954); *Morton v. Ruiz*, 415 U.S. 199, 235
3 (1974); *Abdi v. Duke*, 280 F. Supp. 3d 373 (W.D.N.Y. 2017). ICE agents failed to activate
4 body-worn cameras during a dog-attack arrest, rendering the detention unlawful from inception.
5 *See Catala Decl., Ex. F.*

6 Respondents' reliance on *Barker v. Estelle*, 913 F.2d 1433 (9th Cir. 1990) and *James v.*
7 *Reese*, 546 F.2d 325 (9th Cir. 1976) to suggest the arrest is "moot" is misplaced because in those
8 cases, the challenges were rendered moot by subsequent criminal convictions which constituted a
9 new and independent source of lawful custody. No such superseding authority exists here;
10 Petitioner has not been convicted of any crime, and all criminal charges against him have been
11 dismissed, leaving the challenged enforcement action as the sole source of his detention. *See*
12 *Catala Decl., Ex. D.*

13 Petitioner does not challenge removability or administrative decisions. He challenges the
14 constitutionality of his confinement, which remains cognizable under *Zadvydas v. Davis*, 533
15 U.S. 678 (2001), and as clarified in *Jennings v. Rodriguez*, 583 U.S. 281 (2018). Similarly, *INS v.*
16 *Lopez-Mendoza*, 468 U.S. 1032 (1984) is inapplicable because Petitioner seeks due process
17 relief, not suppression of evidence, termination of removal proceedings. Petitioner is raising a
18 due process challenge to whether the government may continue to detain an individual after
19 inflicting serious injury through excessive force and then failing to provide constitutionally
20 adequate medical care. Courts have long distinguished suppression remedies from due process
21 challenges to the physical conditions and legality of detention itself. *INS v. Lopez-Mendoza*, 468

1 U.S. 1032, 1039–40 (1984) (exclusionary rule generally inapplicable in civil removal
2 proceedings and distinct from challenges to legality of detention); *Bell v. Wolfish*, 441 U.S. 520,
3 535–39 (1979) (due process governs conditions and restrictions of confinement independent of
4 evidentiary suppression).

5 Civil immigration detention is constitutional only if non-punitive and reasonably related
6 to legitimate government objectives. *Bell v. Wolfish*, 441 U.S. 520, 539 (1979). Detention
7 following gratuitous force and deliberate indifference to serious medical needs may become
8 punitive. *Kingsley v. Hendrickson*, 576 U.S. 389 (2015); *Gordon v. County of Orange*, 888 F.3d
9 1118 (9th Cir. 2018).

10 Petitioner's medical records from Legacy Emanuel Medical Center document a "High"
11 severity of trauma, including a laceration requiring sutures and multiple dog bite marks, treated
12 only with minimal over-the-counter medication. *See Catala Decl.*, Ex. E. These injuries persist
13 during detention and directly impair Petitioner's ability to participate meaningfully in his
14 defense. *See Catala Decl.*, Ex. C.

15 **III. Petitioner is Not Subject To Mandatory Detention.**

16 Petitioner's status as an individual who entered without inspection and was not
17 admitted—facts confirmed by his Notice to Appear filed as part of the Respondent's
18 return—places him within the certified "Bond Denial Class" in this District under *Rodriguez*
19 *Vazquez v. Bostock*, No. 3:25-cv-05240 (W.D. Wash.). Contrary to Respondents' insistence on
20 "mandatory detention" under 8 U.S.C. § 1225(b)(2), courts in this District and others have
21

1 repeatedly held that noncitizens like Petitioner, who entered without inspection and were not
2 apprehended at the time of entry, are detained under the discretionary authority of 8 U.S.C. §
3 1226(a), not the mandatory provisions of § 1225(b). In *Rodriguez Vazquez v. Bostock*, No.
4 3:25-cv-05240-TMC, 2025 WL ____ (W.D. Wash. Apr. 24, 2025), this Court granted a
5 preliminary injunction concluding that detainees who entered without inspection and were later
6 apprehended are governed by § 1226(a), ordering bond hearings, and enjoining defendants from
7 treating them as subject to mandatory detention under § 1225(b)(2). Accordingly, Respondents’
8 application of mandatory detention authority to Petitioner, arrested in the interior of the country,
9 is legally incorrect.

10 Respondents’ assertion that Petitioner is lawfully detained under the mandatory
11 provisions of 8 U.S.C. § 1225(b) relies on an overbroad interpretation of the term “applicants for
12 admission” that ignores binding local precedent and the undisputed facts of Petitioner’s interior
13 arrest. While the Government argues that Section 1225(b)(2) serves as a broad catchall for any
14 noncitizen who has not been admitted, this provision is statutorily intended for those seeking
15 entry at the border or who are apprehended immediately “upon arrival”. *Jennings v. Rodriguez*,
16 583 U.S. 281 (2018); *see also* Dkt. 7 at 8. Petitioner was arrested on November 14, 2025, at his
17 long-term residence in Vancouver, Washington—far from any port of entry—and his Notice to
18 Appear (NTA) confirms he was not “admitted” but is instead charged with entry without
19 inspection (EWI) under 8 U.S.C. § 1182(a)(6)(A)(i). By attempting to apply border-focused
20 mandatory detention authority to an individual arrested in the interior of the country,
21 Respondents are acting in direct defiance of this Court’s certification of the “Bond Denial Class”

1 in Rodriguez Vazquez v. Bostock, No. 3:25-cv-05240-TMC, 2025 WL 2782499 (W.D. Wash.
2 Sept. 30, 2025).

3 The Government's reading of the statute would effectively eliminate the discretionary
4 detention scheme established in 8 U.S.C. § 1226(a), rendering that provision—and the
5 criminal-history-based mandatory detention in 8 U.S.C. § 1226(c)—superfluous. This
6 interpretation contradicts the Supreme Court's instruction in *Jennings v. Rodriguez*, 583 U.S. 281
7 (2018), that statutes must be read in harmony to avoid collapsing distinct legal schemes.
8 Furthermore, the nationwide final declaratory judgment in *Maldonado Bautista v. Santacruz*, No.
9 5:25-CV-01873-SSS-BFM, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025), confirmed that the
10 Government is unlawfully subjecting EWI individuals arrested in the interior to mandatory
11 detention under 8 U.S.C. § 1225(b)(2).

12 Moreover, Petitioner's continued confinement fails to serve any legitimate non-punitive
13 purpose. The Government's justification of "protecting the community" is now factually
14 baseless, as all criminal charges against Petitioner have been dismissed, and he has no qualifying
15 offenses under the Laken Riley Act, Pub. L. 119-1, 139 Stat. 3 (2025). *See* Catala Decl., Ex. D;
16 *see also* Dkt. 9 and 10. Under the Fifth Amendment, civil detention must be reasonably related to
17 a non-punitive objective, as established in *Zadvydas v. Davis*, 533 U.S. 678 (2001), and *Bell v.*
18 *Wolfish*, 441 U.S. 520 (1979). Petitioner's detention is excessive and punitive because it follows
19 an arrest characterized by unprovoked dog-bite trauma, clinically categorized as "High" severity,
20 and continues under conditions of medical neglect where the Government provides only minimal
21 medication for deep lacerations and severe pain. *See* Catala Decl., Exs. C, E.

IV. Conditions of Confinement Can Render Detention Unconstitutional

Respondents' contention that the conditions of Petitioner's confinement are constitutional mischaracterizes the record and ignores the unredressed physical and psychological trauma resulting from his conscience-shocking arrest. While Respondents assert that medical care at the Northwest ICE Processing Center (NWIPC) is adequate, Petitioner's treatment records from Legacy Emanuel Medical Center classify his dog-bite injuries as "High" severity trauma. *See* Catala Decl., Ex. E. Despite this, Petitioner continues to suffer from night fevers, dizziness, blurry vision, and internal rib pressure, and only receives minimal doses of basic over-the-counter pain medication. *See* Catala Decl., Ex. C. This failure to provide appropriate treatment for deep, sutured lacerations constitutes deliberate indifference and a denial of the "more considerate treatment" owed to civil detainees, as required under *Jones v. Blanas*, 393 F.3d 918, 931–34 (9th Cir. 2004) and *Youngberg v. Romeo*, 457 U.S. 307, 321–22 (1982). It also satisfies the deliberate indifference standard under *Estelle v. Gamble*, 429 U.S. 97, 104–05 (1976).

Respondents' reliance on the declaration of Dr. Eddie Wang to claim that Petitioner's medical condition has "resolved" mischaracterizes the clinical record. *See* Dkt. 8. The Legacy Emanuel Medical Center records explicitly classify Petitioner's injuries as "High" severity trauma from multiple dog bites requiring surgical irrigation and nylon sutures. *See* Catala Decl., Ex. E at 9. The Petitioner repeatedly sought medical assistance, referring himself to medical staff on numerous occasions and requesting help for his ongoing condition. *See* Catala Decl., Ex. C. Dr. Wang documents these visits but provides no documentation or meaningful detail regarding

1 the nature of treatment that was administered. *See* Dkt. 8 at 3-4. The treatment provided was
2 minimal at most, but mostly nonexistent. *See* Catala Decl., Ex. C. Furthermore, although
3 medication was prescribed by Legacy Emanuel Medical Center, Dr. Wang does not indicate
4 whether that medication was ever actually provided to the Petitioner in accordance with the
5 recommendations of the hospital, nor whether the medication was even obtained for the
6 Petitioner. *See* Dkt. 8. Petitioner's pain has not resolved and he has not told medical staff
7 otherwise. *See* Catala Decl., Ex. C. Dr. Wang's assertion that Petitioner's pain resolved within
8 about a week is directly contradicted by ongoing symptoms. Petitioner continuously reported and
9 continues to report persistent pain, fevers, dizziness, numbness in his arm, and other symptoms,
10 requesting further evaluation or treatment, but his requests were either denied or minimized. *See*
11 Catala Decl., Ex. C; *see also* Dkt. 8.

12 Under *Jones v. Blanas*, 393 F.3d 918, 931 (9th Cir. 2004), civil detainees are entitled to
13 "more considerate treatment" than criminal prisoners; providing only minimal care for injuries
14 clinically labeled as high-severity trauma falls short of this constitutional standard. Because these
15 conditions have converted administrative custody into prohibited punishment under *Bell v.*
16 *Wolfish*, 441 U.S. 520 (1979), and because any public safety justification is now factually
17 baseless following the dismissal of all criminal charges, Petitioner is entitled to immediate
18 release.

19 Furthermore, Respondents' claim that Petitioner's detention is not punitive also fails.
20 Under *Bell v. Wolfish*, 441 U.S. 520, 535-39 (1979), detention becomes unconstitutional if it is
21 "excessive in relation to [its] non-punitive purpose". Here, the Government's justification that

1 detention protects the community is factually baseless. *See* Dkt. 7 at 14. To reiterate, all criminal
 2 charges against Petitioner have been dismissed, and he has no convictions. *See* Catala Decl., Ex.
 3 D. Detaining a father of three, whose children witnessed him being unprovokedly mauled by a
 4 dog, under conditions that exacerbate his physical and psychological trauma, is
 5 conscience-shocking and bears no legitimate administrative purpose. Because the conditions of
 6 confinement have rendered civil detention punitive from its inception, habeas relief under 28
 7 U.S.C. § 2241 is proper, and Petitioner is entitled to immediate release rather than a mere bond
 8 hearing (see *Fay v. Noia*, 372 U.S. 391, 438–39 (1963); *Zadvydas v. Davis*, 533 U.S. 678,
 9 690–91 (2001)).

10 **V. Exhaustion of Administrative Remedies is Prudential and Should be Waived.**

11 The Government's suggestion that Petitioner must wait for the immigration court process
 12 is a stalling tactic. *See* Dkt. 7 at 6. The Government asserts that Petitioner must raise his claims
 13 within his ongoing immigration proceedings, arguing that "statutory channeling" under 8 U.S.C.
 14 § 1252 bars this Court's review. *See* Dkt. 7 at 3. This argument misconstrues the nature of the
 15 exhaustion requirement in habeas proceedings. Exhaustion in § 2241 cases is prudential, not
 16 jurisdictional. *Arango Marquez v. INS*, 346 F.3d 892, 896–97 (9th Cir. 2003); *Ali v. Ashcroft*, 346
 17 F.3d 873, 877–78 (9th Cir. 2003). Following *Santos-Zacaria v. Garland* (2023), statutory
 18 exhaustion requirements are understood as non-jurisdictional claims-processing rules.
 19 *Santos-Zacaria v. Garland*, 598 U.S. 411, 416–23 (2023); see also *Kemokai v. U.S. Att'y Gen.*,
 20 83 F.4th 886, 891 (11th Cir. 2023) (recognizing *Santos-Zacaria* as treating INA §242(d)(1) as a
 21 claims-processing rule).

Exhaustion is waived when administrative remedies are inadequate or futile. *Vasquez-Rodriguez v. Garland*, 7 F.4th 888, 893–97 (9th Cir. 2021); *Szonyi v. Whitaker*, 915 F.3d 1228, 1232–35 (9th Cir. 2018); *Perez-Guzman v. Lynch*, 835 F.3d 1066, 1073 (9th Cir. 2016); *Gonzalez v. O'Connell*, 355 F.3d 1010, 1015–18 (7th Cir. 2004); *Iddir v. INS*, 301 F.3d 492, 498 (7th Cir. 2002). An immigration judge has no authority to remedy the Fourth Amendment violations of the arrest or the Fifth Amendment violations regarding medical neglect in a bond hearing. INA §242(a)(2)(D); see REAL ID Act, Pub. L. No. 109-13, div. B, §106, 119 Stat. 231 (2005). Furthermore, the continued loss of liberty and physical suffering Petitioner faces constitutes irreparable harm, necessitating immediate intervention by this Court. *Stellar IT Solutions, Inc. v. USCIS*, No. 18-2015 (RC), 2018 WL 6047413, at 5 (D.D.C. Nov. 19, 2018); *Mathews v. Eldridge*, 424 U.S. 319, 330 (1976).

Contextually, requiring Petitioner to wait for the conclusion of his immigration proceedings would be both futile and result in irreparable harm:

1. **Inadequacy of Administrative Relief:** The Government suggests that the only remedy for Petitioner's violent arrest is the suppression of evidence in immigration court. *See* Dkt. 7 at 6. However, as the Government admits, an Immigration Judge (IJ) cannot grant release based on Fourth Amendment violations. *Id.* An IJ lacks the authority to remedy the unconstitutional nature of the detention itself or the Fifth Amendment violations stemming from medical neglect.
2. **Imminent and Irreparable Physical Harm:** While the Government claims Petitioner's vital signs are "normal", Petitioner remains in a state of physical and emotional crisis. *See*

1 Dkt. 7 at 12-13; *see also* Catala Decl., Ex. C. The administrative process, which has
 2 already seen hearings reset and continued into late January 2026, offers no immediate
 3 relief for these symptoms. *See* Catala Decl., Ex. G.

- 4 3. **Futility of the Mandatory Detention Defense:** The Government argues Petitioner is
 5 subject to "mandatory detention" under § 1225(b) and must wait for the administrative
 6 process to play out. *See* Dkt. 7 at 1, 5, 8. However, as mentioned, since Petitioner was not
 7 apprehended at the border, he is actually a member of the classes defined in *Rodriguez*
 8 *Vazquez v. Bostock* and *Maldonado Bautista v. Santacruz*, meaning his detention is
 9 discretionary under § 1226(a). Exhaustion is unnecessary where the Government is
 10 applying the wrong statutory framework.

11 CONCLUSION

12 For the foregoing reasons, Petitioner W.T.M. respectfully submits that Respondents'
 13 Return fails to justify his continued detention. The Government has not demonstrated any lawful
 14 basis for holding Petitioner in custody, and its arguments regarding jurisdiction, statutory
 15 authority, and conditions of confinement are legally and factually deficient.

16 Petitioner's detention is punitive, excessive, and unlawful. It stems from a violent,
 17 conscience-shocking and unconstitutional arrest, compounded by deliberate indifference to
 18 serious medical injuries, and continues under conditions that violate his constitutional rights. No
 19 administrative remedy can adequately address these harms, and requiring exhaustion would be
 20 futile, exposing Petitioner to continued irreparable physical and psychological injury. Petitioner
 21

1 poses no flight risk or danger, as shown by his family ties and dismissal of all charges resulting
2 in no convictions.

3 Accordingly, Petitioner respectfully requests that this Court reject Respondents' Return,
4 find that his detention is unlawful, and grant the Petition for Writ of Habeas Corpus, ordering his
5 immediate release. Petitioner respectfully requests that the Court expedite its consideration and
6 ruling on this petition as soon as practicable.

7 **WHEREFORE, Petitioner respectfully requests that this Court grant the Writ of**
8 **Habeas Corpus and order his immediate release.**

9 Dated: 01/02/2025

10 *s/ Olia Catala*

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18 **CERTIFICATE OF WORD COUNT**

19 I hereby certify that the foregoing Traverse contains 3593 words, excluding the caption,
20 tables of contents, table of exhibits, signature block, and any exhibits attached.

21 Executed this 2nd day of January, 2026.

s/ Diyora Ismailova

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EXHIBIT LIST

The following exhibits are true copies of the documents indicated. They are incorporated by reference into this petition. *See* Catala Decl.

Exhibit C Declaration of W.T.M.

Exhibit D Evidence of dismissed criminal charges and lack of qualifying offenses under Laken Riley Act

Exhibit E Legacy Emanuel Medical Center medical records documenting dog bite injuries, lacerations, and trauma

Exhibit F ICE Directive 19010.3 (Body-Worn Camera Policy)

Exhibit G Tacoma Immigration Court Next Master Calendar Hearing Notice currently set for January 20, 2026