

THE HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ADEN HUSSEN HASSAN,

Petitioner,

vs.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; LAURA
HERMOSILLO, Acting Seattle Field
Office Director, United States
Citizenship and Immigration Services;
BRUCE SCOTT, Warden of Immigration
Detention Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No. CV25-2444-KKE

**PETITIONER'S NOTICE OF
MOTION FOR TEMPORARY
RESTRAINING ORDER**

NOTICE OF MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Local Court Rule 65(b), Petitioner Aden Hassan hereby requests that the Court issue a temporary restraining order directing Respondents to not transfer him out of this district, immediately release him from the Northwest Immigration and Customs Enforcement Processing Center in Tacoma, Washington and return him to his prior Order of Supervision. This motion is supported by the following Memorandum of Points and Authorities, and by his Petition for Writ of Habeas Corpus and supporting exhibits. Dkts. 2, 2-1 and 2-2.

1 Undersigned counsel hereby declares and certifies that on December 10, 2025,
2 after receiving Respondent's Notice of Intent to Remove (dkt. 10), she emailed
3 Alixandria K. Morris at the United States Attorney's Office of the Western District of
4 Washington of her intention of filing a TRO due to Mr. Hassan's health. On December
5 11, 2025, undersigned counsel was told by AUSA Morris that he was being taken off
6 the manifest for this upcoming removal as ICE believes he is having surgery soon.
7 Undersigned counsel further declares and certifies that on December 12, 2025, she
8 emailed AUSA Morris to again advise that Petitioner is filing this motion for a
9 temporary restraining order. That email also contained copies of the (1) Motion for
10 Temporary Restraining Order, (2) Exhibits in Support of the Motion for Temporary
11 Restraining Order, and (3) Proposed Order.

12 DATED this 12th day of December, 2025.

13 Respectfully Submitted,
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15 *s/ Elizabeth Sher*
16 Assistant Federal Public Defender
17 Attorney for Aden Hassan
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