

District Judge David G. Estudillo
Magistrate Judge Michelle L. Peterson

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

A-C-J-, an adult,

Petitioner,

v.

Laura HERMOSILLO, Field Office
Director of Enforcement and Removal
Operations, Seattle Field Office,
Immigration and Customs Enforcement
(ICE); Bruce SCOTT, Warden,
Northwest ICE Processing Center;
Kristi NOEM, Secretary of Homeland
Security; Pamela BONDI, U.S.
Attorney General; U.S.
DEPARTMENT OF HOMELAND
SECURITY;

Respondents.

Civil Case No.: 2:25-cv-02486-DGE-MLP

**AMENDED PETITION FOR WRIT
OF HABEAS CORPUS**

Oral argument requested

Expedited hearing requested

INTRODUCTION

1
2 1. This case challenges the unlawful re-detention of Ms. A-C-J-, who entered the
3 United States in mid-2016 as an unaccompanied child seeking asylum. In 2016, she was
4 apprehended shortly after her entry and transferred to the custody of Office of Refugee
5 Resettlement (ORR). She was released into the custody of her uncle in Woodburn, Oregon
6 in 2016.

7 2. Since her release, Petitioner timely filed an application for asylum, complied
8 with the conditions imposed by Immigration and Customs Enforcement (ICE), attended all
9 court proceedings, and has been granted employment authorization. She married and had
10 two young U.S. citizen children who are now ages 9 months and 3 years old.

11 3. On December 3, 2025, Petitioner was detained in Woodburn, Oregon in a car
12 stop. There was no explanation for her arrest.

13 4. ICE subsequently transferred Ms. C-J- to the Northwest ICE processing center
14 (NWIPC), where she remains detained.

15 5. Before re-detaining Ms. C-J-, Respondents did not provide her with any
16 written notice explaining the basis for the revocation of her release. Nor did they provide
17 her with a hearing before a neutral decisionmaker where ICE was required to justify the
18 basis for re-detention or explain why Ms. C-J- is a flight risk or danger to the community.

19 6. As this Court has recently held in multiple cases, due process demands such
20 a hearing *prior* to the government’s decision to terminate a person’s liberty. *See E.A. T.-*
21 *B. v. Wamsley*, --- F. Supp. 3d --- No. C25-1192-KKE, 2025 WL 2402130 (W.D. Wash.
22 Aug. 19, 2025); *Order Granting Mot. For Temp. Rest. Order, Ramirez Tesara v. Wamsley*,
23 No. 2:25-cv-01723-MJP-TLF (W.D. Wash. Sept. 11, 2025), Dkt. 19 (hereinafter “*Ramirez*
24 *Tesara*, Dkt. 19”); *Kumar v. Wamsley, Order Granting Mot. for Temp. Rest. Order, Kumar*
25 *v. Wamsley*, 2:25-cv-01772-JHC-BAT (W.D. Wash. Sept. 17, 2025), Dkt. 11 (hereinafter
26 “*Kumar*, Dkt. 11).
27
28

1 7. By failing to provide such a hearing, Respondents have violated Ms. C-J-'s
2 constitutional right to due process. They have also violated the statutory requirement that
3 warrantless arrests like that of Ms. C-J- occur only after the arresting officer assesses if the
4 person poses a flight risk. *See* 8 U.S.C. § 1357(a)(2).

5 8. Accordingly, the court should grant the instant petition for a writ of habeas
6 corpus and order her immediate release. *See E.A. T.-B.* 2025 WL 2402130, at *6 (ordering
7 immediate release because “a post-deprivation hearing cannot serve as an adequate
8 procedural safeguard because it is after the fact and cannot prevent an erroneous
9 deprivation of liberty”); *Ramirez Tesara*, Dkt. 19 (ordering immediate release to restore
10 Petitioner to the status quo prior to the unlawful arrest without a hearing).

11
12 **JURISDICTION**

13 9. Petitioner is in the physical custody of Respondents. Petitioner is detained at
14 the NWIPC.

15 10. This Court has jurisdiction under 28 U.S.C. § 2241 (federal habeas statute),
16 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of United States
17 Constitution (The Suspension Clause).

18 11. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory
19 Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

20 **VENUE**

21 12. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484,
22 493–500 (1973), venue lies in the United States District Court for the Western District of
23 Washington, the judicial district in which Petitioner is currently detained.

24 13. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because
25 Respondents are employees, officers, and agencies of the United States, and because a
26 substantial part of the events or omissions giving rise to the claims occurred in the Western
27 District of Washington.

PARTIES

18. Petitioner, A-C-J-, is a 24 year old non-citizen from Guatemala was arrested by ICE on December 3, 2025. She is detained at NWIPC.

19. Respondent Laura Hermosillo is the Director of the Seattle Field Office of ICE's Enforcement and Removal Operations division. As such, Ms. Hermosillo is Petitioner's immediate custodian and is responsible for her detention and removal. She is named in her official capacity.

20. Respondent Bruce Scott is employed by The GEO Group, Inc., as Warden of the NWIPC, where Petitioner is detained. He has immediate physical custody of Petitioner. He is sued in his official capacity.

21. Respondent Kristi Noem is the Secretary of the Department of Homeland Security ("DHS"), and is sued in her official capacity. The Secretary of Homeland Security is charged with the administration and enforcement of immigration laws. 8 U.S.C. § 1103(a).

22. Respondent Pamela Bondi is the Attorney General of the United States and is sued in her official capacity as the head of the Department of Justice. The Attorney General is responsible for the fair administration of the laws of the United States.

23. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

LEGAL FRAMEWORK

24. Ms. C-J-'s detention as an unaccompanied minor encountered at the border was governed by the Trafficking Victims Protection and Reauthorization Act ("TVPRA"). The TVPRA provides that, in making custody determinations, ORR should consider, among other things, "danger to self, danger to the community, and risk of flight." 8 U.S.C. § 1232(c)(2)(A).

1 25. Thus to release Petitioner as a minor from ORR custody, ORR determined
2 that Petitioner was not a danger to the community or a flight risk. *See Id.*; *see also*
3 *Saravia v. Sessions*, 280 F. Supp. 3d 1168, 1176, 1178 (N.D. Cal. 2017) (“ORR may
4 release the minor to a ‘sponsor’ . . . so long as the minor is not dangerous . . . Release
5 [therefore] reflects a determination by the government that the noncitizen is not a danger
6 to the community or a flight risk”).

7 26. The United States Citizenship and Immigration Services (USCIS) has
8 jurisdiction over asylum applications filed by unaccompanied minors pursuant to the
9 TVPRA. 8 U.S.C. § 1158(b)(3)(C). In circumstances like that of Ms. C-J-, where an
10 unaccompanied child filed an asylum application prior to age 18 and never reunifies with
11 a parent or guardian, USCIS has exclusive jurisdiction to decide the application, not the
12 Immigration Court. 8 USC § 1158(b)(3)(C); *see also Matter of M-A-C-O-*, 27 I&N Dec.
13 477, 478–79 (BIA 2018). USCIS is not currently deciding any asylum applications.
14 USCIS, *Policy Memorandum* (Dec. 2, 2025) available at [https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHigh](https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf)
15 [RiskCountries-20251202.pdf](https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf).

17 27. However, under current caselaw that governs the immigration court system,
18 the Executive Office for Immigration Review (EOIR) considers an individual like Ms. C-
19 J- — who entered without admission or parole — to be subject to mandatory detention.
20 *See Matter of Yajure Hurtado*, 29 I.&N. Dec. 216 (BIA 2025); *but see Maldonado*
21 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.) *Maldonado Bautista v.*
22 *Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at *11
23 (C.D. Cal. Nov. 20, 2025) (order granting partial summary judgment to named Plaintiffs-
24 Petitioners); *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F.
25 Supp. 3d ----, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025) (order certifying
26 Plaintiffs-Petitioners’ proposed nationwide Bond Eligible Class, incorporating and
27 extending declaratory judgment from Order Granting Petitioners’ Motion for Partial
28 Summary Judgment providing current EOIR practices

1 unlawful EOIR, the Immigration Courts and DHS have blatantly refused to abide by the
2 declaratory relief).

3 28. At the time Ms. C-J- entered the United States in 2016, EOIR caselaw
4 provided that adults in situations similar to her were detained under 8 U.S.C. § 1226(a).
5 *See, e.g., Matter of R-A-V-P-*, 27 I.&N. Dec. 803, 803 (BIA 2020).

6 29. Regardless of the statutory basis for detention, due process requires that a
7 person like Mr. C-J- receive a hearing before a neutral decisionmaker to determine
8 whether any re-detention is justified, and whether the person is a flight risk or danger to
9 the community

10 30. “Freedom from imprisonment — from government custody, detention, or
11 other forms of physical restraint — lies at the heart of the liberty protected by the Due
12 Process Clause.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). As this Court recently
13 recognized, this is the “the most elemental of liberty interests.” *E.A. T.-B.*, 2025 WL
14 2402130, at *3 (citation modified); *see also Ramirez Tesara*, Dkt. 19 at 5 (stating that the
15 petitioner had “an exceptionally strong interest in freedom from physical confinement”).

16 31. Consistent with this principle, individuals released on parole or other forms
17 of conditional release have a liberty interest in their “continued liberty.” *Morrissey v.*
18 *Brewer*, 408 U.S. 471, 482 (1972).

19 32. Such liberty is protected by the Fifth Amendment because, “although
20 indeterminate, [it] includes many of the core values of unqualified liberty,” such as the
21 ability to be gainfully employed and live with family, “and its termination inflicts a
22 ‘grievous loss’ on the [released individual] and often on others.” *Id.*

23 33. To guarantee against arbitrary re-detention and to guarantee the right to
24 liberty, due process requires “adequate procedural protections” that ensure the
25 government’s asserted justification for a noncitizen’s physical confinement “outweighs
26 the individual’s constitutionally protected interest in avoiding physical restraint.”
27 *Zadvydas*, 533 U.S. at 690 (citation modified).

1 34. Due process thus guarantees notice and an individualized hearing before a
2 neutral decisionmaker to assess danger or flight risk before the revocation of an
3 individual's release. *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) ("The fundamental
4 requisite of due process of law is the opportunity to be heard . . . at a meaningful time in
5 a meaningful manner." (citation modified)); *see also, e.g., Morrissey*, 408 U.S. at 485
6 (requiring "preliminary hearing to determine whether there is probable cause or
7 reasonable ground to believe that the arrested parolee has committed . . . a violation of
8 parole conditions" and that such determination be made "by someone not directly
9 involved in the case" (citation modified)).

10 35. Several courts, including this one, have recognized that these principles
11 apply with respect to the re-detention of the many noncitizens that DHS has recently
12 begun taking back into custody, often after such persons have been released for months
13 and years

14 36. For example, in *E.A. T.-B.*, this Court applied the *Mathews v. Eldridge*, 424
15 U.S. 319 (1976), framework to hold that even in a case where the government asserted
16 that mandatory detention applied, a person's re-detention could not occur absent a
17 hearing. The Court in *Ramirez Tesara* did the same. *See Ramirez Tesara*, Dkt. 19 at 5.

18 37. In applying the three *Mathews* factors, the *E.A. T.B.* court held that the
19 petitioner had "undoubtedly [been] deprive[d] . . . of an established interest in his
20 liberty," *E.A. T.-B.*, 2025 WL 2402130, at *3, which, as noted, "is the most elemental of
21 liberty interests," *id.* (citation modified). The Court further explained that even if
22 detention was mandatory, the risk of erroneous deprivation of liberty without a hearing
23 was high because a hearing serves to ensure that the purposes of detention—the
24 prevention of danger and flight risk—are properly served. *Id.* at *4–5. Finally, the Court
25 explained that "the Government's interest in re-detaining non-citizens previously released
26 without a hearing is low: although it would have required the expenditure of finite
27 resources (money and time) to provide Petitioner notice and hearing on [ISAP] violations
28 before arresting and re-detaining him, those costs are

1 far outweighed by the risk of erroneous deprivation of the liberty interest at issue.” *Id.* at
2 *5. As a result, this Court ordered the petitioner’s immediate release. *Id.* at *6.

3 38. This Court held the same in *Ramirez Tesara*. There, the Court reasoned that
4 the petitioner had a “weighty” interest in his liberty and was entitled to the “full
5 protections of the due process clause.” *Ramirez Tesara*, Dkt. 19 at 6. When examining
6 the value of additional safeguards, the Court also noted that despite government’s
7 allegations of ISAP violations, “the fact ‘that the Government may believe it has a valid
8 reason to detain Petitioner does not eliminate its obligation to effectuate the detention in a
9 manner that comports with due process.’” *Id.* at 8 (*quoting E.A. T.-B*, 2025 WL 2402130,
10 at *4). Finally, the Court reasoned that any government interest in re-detention without a
11 hearing was “minimal.” *Id.* Accordingly, there too, the Court ordered the Petitioners’
12 immediate release. *Id.* at 10–11.

13 39. This Court’s decisions in *E.A. T.-B.* and *Ramirez Tesara* are consistent with
14 many other district court decisions addressing similar situations. *See, e.g., R.D.T.M. v.*
15 *Wofford*, 1:25-cv-01141-KES-SKO (E.D. Cal. Sept. 9, 2025) (ordering immediate release
16 of unaccompanied child previously in ORR custody); *Valdez v. Joyce*, No. 25 CIV. 4627
17 (GBD), 2025 WL 1707737 (S.D.N.Y. June 18, 2025) (ordering immediate release due to
18 lack of pre-deprivation hearing); *Pinchi v. Noem*, --- F. Supp. 3d ---, No. 5:25-CV-
19 05632-PCP, 2025 WL 2084921 (N.D. Cal. July 24, 2025) (similar); *Maklad v. Murray*,
20 No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar);
21 *Garcia v. Andrews*, No. 1:25- CV-01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug.
22 21, 2025) (similar).

23 40. The same framework and principles apply here and compel Ms. C-J-’s
24 immediate release.

FACTS

Respondents' Detention and Deportation Policies.

41. On January 20, 2025, the president of the United States issued several executive actions relating to immigration, including “Protecting the American People Against Invasion,” an executive order (EO) setting out a series of interior immigration enforcement actions. The present administration, through this and other actions, has outlined sweeping, executive branch-led changes to immigration enforcement policy, establishing a formal framework for mass deportation.

42. The “Protecting the American People Against Invasion” EO instructs the DHS Secretary “to take all appropriate action to enable” ICE, CBP, and USCIS to prioritize civil immigration enforcement procedures including through the use of mass detention.

43. In late May 2025, respondent Kristi Noem and White House Deputy Chief of Staff Stephen Miller met with ICE leadership and set a arrest quota of 3,000 per day and reportedly threatening job consequences if officials failed to meet arrest quotas.¹

44. On May 28, 2025 Deputy Chief of Staff Miller confirmed that “[u]nder President Trump’s leadership, we are looking to set a goal of a minimum of 3,000 arrests for ICE every day, and President Trump is going to keep pushing to get that number up higher each and every single day.”²

¹Julia Ainsley, et al., A sweeping new ICE operation shows how Trump’s focus on immigration is reshaping federal law enforcement, NBC News (June 4, 2025), <https://www.nbcnews.com/politics/justicedepartment/ice-operation-trump-focus-immigrationreshape-federal-lawenforcement-rcna193494> (last visited Nov 26, 2025); Brittany Gibson & Stef W. Kight, Scoop: Stephen Miller, Noem tell ICE to supercharge immigration arrests, Axios (May 28, 2025), available at <https://www.axios.com/2025/05/28/immigration-ice-deportations-stephen-miller> (last visited Nov. 26, 2025).

²Hannity, Sean, “Stephen Miller says the admin wants to create the strongest immigration system in US History”, FOX NEWS (May 28, 2025), <https://www.foxnews.com/video/6373591405112> (last visited Nov. 26, 2025).

1 45. Following the directive from Noem and Miller, ICE agents were instructed
2 in an email to “turn the creativity knob up to 11” and aggressively “push the envelope” in
3 arrests, including by pursuing “collaterals.” One email is reported to have said: “If it
4 involves handcuffs on wrists, it’s probably worth pursuing.”³

5 **Petitioner entered the United States as an unaccompanied minor and was released**
6 **into the custody of a sponsor, her uncle.**

7 46. Ms. C-J- is a citizen of Guatemala who arrived in the United States on June
8 4, 2016 when she was 14 years old. Upon entry, Petitioner encountered border and
9 immigration officials, who detained her and transferred her to the custody of the Office of
10 Refugee Resettlement (ORR).

11 47. On July 27, 2016, ORR released Petitioner to the custody of her uncle.

12 48. Following Petitioner’s release from ICE custody, she moved to Woodburn,
13 Oregon. She attended community college. She met her partner and got married. She
14 gave birth to her now 3-year-old U.S. citizen daughter and now 9-month-old U.S. citizen
15 son. She works hard as a field worker when not caring for her children.

16 49. Ms. C-J- indicates that she complied with the requirements of her release.
17 She has not been arrested and has no criminal convictions. She attended all required
18 immigration court hearings.

19 **Petitioner has an asylum application pending pursuant to the TVPRA.**

20 50. 

21 

22

23

24

25

26 _____
27 ³Olivares, José , “US immigration officers ordered to arrest more people even without warrants,”
28 The Guardian (Jun 4, 2025) <https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests>

1 52. The Department of Homeland Security (DHS) filed a Notice to Appear in
2 Petitioner's case around June 2016 charging her as removable pursuant to INA §
3 212(a)(6)(A)(i),

4 53. On March 13, 2017, Ms. C-J- timely filed an application for asylum with the
5 asylum office within one year of her arrival into the United States. Because she was an
6 unaccompanied child at the time, USCIS took jurisdiction of her case pursuant to the
7 TVPRA. Her asylum application remains pending with USCIS. Because of her pending
8 asylum application with USCIS, the Immigration Court administratively closed Ms. C-J-'s
9 removal proceedings on December 5, 2017. It has since been re-calendared.

10 **Petitioner was arrested without a warrant**

11 54. On December 3, 2025, Ms. C-J- was travelling to work in a van along with
12 other individuals travelling to work with her at a nursery. Multiple cars pulled over the
13 van.

14 55. Within minutes of the stop, officers pepper sprayed the driver. Detention
15 officers demonstrated their weapons.

16 56. Detention officers asked those in the van to get out of the vehicle. She was
17 placed in handcuffs behind her back. She was not asked any questions or to show any
18 paperwork.

19 57. Along with almost everyone else in the van, including a 15 year old child,
20 Ms. C-J- was transported in handcuffs to the ICE office in Portland, Oregon.

21 58. In Portland, Ms. C-J- was asked her name, date of birth, and where and
22 when she crossed the border. The officers provided Ms. C-J- no explanation for why she
23 was being arrested.

24 59. Prior to Ms. C-J-'s rearrest, neither she nor counsel received written notice
25 of the reason for her re-detention.

26 60. Prior to Ms. C-J-'s rearrest, ICE did not assess whether she presented a flight
27 risk or danger to the community, or whether her arrest was justified for some other
28 reason.

1 61. Prior to Ms. C-J-'s rearrest, she did not receive a hearing before a neutral
2 factfinder to determine if his re-detention is justified.

3 62. Petitioner faces imminent transfer outside of this judicial district.
4

5 **CLAIMS FOR RELIEF**

6 **COUNT I**

7 ***Violation of Fifth Amendment Right to Due Process***

8 ***Procedural Due Process***

9 63. Ms. C-J- restates and realleges all paragraphs as if fully set forth herein.

10 64. Due process does not permit the government to re-detain Mr. C-J- and strip
11 her of her liberty without written notice and a pre-deprivation hearing before a neutral
12 decisionmaker to determine whether re-detention is warranted based on danger or flight
13 risk. *See Morrissey*, 408 U.S. at 487–88. Such written notice and a hearing must occur
14 prior to any re-detention.

15 65. Respondents revoked Ms. C-J-'s release and deprived her of liberty without
16 providing her written notice and a meaningful opportunity to be heard by a neutral
17 decisionmaker prior to her re-detention.

18 66. Accordingly, Ms. C-J-'s re-detention violates the Due Process Clause of the
19 Fifth Amendment.

20 **COUNT II**

21 ***Violation of 8 U.S.C. § 1357(a)(2)***

22 ***Arrest without Flight Risk Assessment***

23 67. Ms. C-J- restates and realleges all paragraphs as if fully set forth herein.

24 68. 8 U.S.C. § 1357(a)(2) and its implementing regulations require that, for
25 noncitizens arrested “in the United States,” the arresting officer must have a “reason to
26 believe” that the noncitizen “is likely to escape before a warrant can be obtained for his
27 arrest.”
28

1 69. To meet this requirement, officers must have “grounds for a reasonable
2 belief that they were particularly likely to escape.” *Mountain High Knitting, Inc. v. Reno*,
3 51 F.3d 216, 218 (9th Cir. 1995). A “reason to believe” is equivalent to “the
4 constitutional requirement of probable cause.” *Tejeda-Mata v. INS*, 626 F.2d 721, 725
5 (9th Cir. 1980).

6 70. 8 C.F.R. § 287.8(c)(2)(ii) reinforces these requirements by stating that
7 before making a warrantless arrest, an immigration officer must make an individualized
8 determination that an individual is “likely to escape before a warrant can be obtained.”
9 58.

10 71. The officer who arrested Ms. C-J- did not make an individualized
11 determination based on a reasonable belief or probable cause that Mr. C-J- is a flight risk.

12 72. Accordingly, Ms. C-J-’s arrest violated the mandatory statutory and
13 regulatory requirements that govern ICE’s conduct in such arrests and was unlawful.

14
15 **PRAYER FOR RELIEF**

16 **WHEREFORE**, Petitioner prays that this Court grant the following relief:

- 17 (1) Assume jurisdiction over this matter;
- 18 (2) Enjoin Respondents from transferring Petitioner outside of this judicial
19 district without notice to an approval by the Court;
- 20 (3) Issue an order to show cause why this petition should not be granted within
21 three (3) days.
- 22 (4) Issue a Writ of Habeas Corpus ordering Respondents to release Ms. C-J- from
23 custody immediately and permanently enjoining her re-detention during the pendency of
24 his removal proceeding absent written notice and a hearing prior to re-detention where
25 Respondents must prove by clear and convincing evidence that she is a flight risk or danger
26 to the community and that no alternatives to detention would mitigate those risks;
- 27
28

1 (5) Declare that Ms. C-J-'s re-detention while removal proceedings are ongoing
2 without first providing an individualized determination before a neutral decisionmaker
3 violates the Due Process Clause of the Fifth Amendment;

4 (6) Issue a writ of habeas corpus ordering respondents to release petitioner from
5 custody;

6 (7) Award costs and reasonable attorney fees incurred under this action under 28
7 U.S.C. § 2412, et. seq. (Equal Access to Justice Act); and

8 (8) Grant any further relief that this Court may deem fit and proper.
9

10 Dated: December 11, 2025

Respectfully Submitted,

11 *s/Nancy Alexander*

12 Nancy Alexander, OSB # 185664
13 (Pro Hac Vice)
14 Lucas & Barba LLP
15 1201 SW 12th Ave., Suite 410
16 Portland, OR 97205
(503) 457-4495

s/Shara Svendsen

Shara Svendsen, WSB # 38151
Law Office of Shara Svendsen PLLC
16300 Mill Creek Blvd. Ste 206
Mill Creek, WA 98012

Attorneys for Petitioner