

DETAINED

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2
3
4 UNITED STATES DISTRICT COURT
5 WESTERN DISTRICT OF WASHINGTON
6 AT SEATTLE

7 Greggory SORIO,

8 Petitioner,

9 v.

10 Laura HERMOSILLO, Seattle Field Office
11 Director, Enforcement and Removal Operations,
12 United States Immigration and Customs
13 Enforcement (ICE); Bruce SCOTT, Warden,
14 Northwest ICE Processing Center; Kristi
15 NOEM, Secretary, United States Department of
16 Homeland Security; Pamela BONDI, United
17 States Attorney General; UNITED STATES
18 DEPARTMENT OF HOMELAND
19 SECURITY;

20 Respondents.

Case No.: 2:25-cv-2492

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

21 **INTRODUCTION**

22 1. This case challenges the unlawful detention of Mr. Greggory Sorio who is in
23 imminent danger of being removed pursuant to an Order of Removal and denied Stay of
24 Removal request. Mr. Sorio is set to be deported on Monday, December 8, 2025, at 9:30 PM
25 PST. Mr. Sorio is medically unsafe to travel due to severe medical neglect he has faced while
26 in custody at the Northwest ICE Processing Center.

27 2. This petition for habeas corpus alleges (1) the Mr. Sorio's procedural due process
28 rights were violated when he had no opportunity to be heard before neutral decisions maker
PETITION FOR WRIT OF HABEAS CORPUS
(CASE NO. 2:25-cv-2492)

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Peyton Jacobsen
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1 with regard to appealing his Stay of Removal; (2) Mr. Sorio's substantive due process rights as
2 it relates to his right to bodily autonomy and bodily integrity were violated when he was denied
3 medical care causing substantial bodily harm, loss of his limbs and ongoing medical instability;
4 and (3) Mr. Sorio's due process rights were violated under the unconstitutionally punitive
5 conditions of confinement doctrine. *See, Gutierrez-Lopez v. Figueroa*, 462 F.Supp.3d 973
6 (2020).

8 3. Mr. Sorio argues that continues detention under the present conditions is
9 unconstitutional and his immediate release is the only effective remedy. *See, Id.*

10 4. Mr. Sorio does not seek to overturn the decision of the Immigration Judge
11 ordering his removal; rather, he seeks release from custody to permit him to attend his future
12 doctor's appointment and receive adequate medical attention.

14 5. Petitioner needs critical healthcare and cannot be removed from the United States
15 in his current condition. Petitioner's right to due process is at risk of being violated and he has a
16 substantial interest in a redetermination of his custody.

18 6. In support of this petition, Petitioner relies upon the accompanying evidence in
19 support of an accompanying Temporary Restraining Order. Petitioner respectfully requests that
20 this court grant this emergency application, issue a temporary restraining order, and grant
21 petitioner's motion to show cause.

22 JURISDICTION

24 7. Petitioner is in the physical custody of Respondents. Petitioner is detained at the
25 Northwest Detention Center in Tacoma, Washington.

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1 8. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28
2 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States
3 Constitution (the Suspension Clause).

4 9. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory
5 Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

7 **VENUE**

8 10. Venue is proper because Mr. Sorio is in Respondent's custody at the NWIPIC in
9 Tacoma, Washington. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S.
10 484, 493- 500 (1973), venue lies in the United States District Court for the Western District of
11 Washington, the judicial district in which Petitioner currently is detained.

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

16 **REQUIREMENTS OF 28 U.S.C. § 2243**

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

21 13. Habeas corpus is "perhaps the most important writ known to the constitutional
22 law . . . affording as it does a swift and imperative remedy in all cases of illegal restraint or
23 confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963). "The application for the writ usurps the

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1 attention and displaces the calendar of the judge or justice who entertains it and receives prompt
2 action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120
3 (9th Cir. 2000) (citation omitted); *see also Van Buskirk v. Wilkinson*, 216 F.2d 735, 737–38 (9th
4 Cir. 1954) (habeas corpus is “a speedy remedy, entitled by statute to special, preferential
5 consideration to insure expeditious hearing and determination”).
6

7 **PARTIES**

8 14. Petitioner Greggy Valerio Sorio is a citizen of the Philippines who has been in
9 immigration detention since March 1, 2025. After Petitioner was arrested in Kodiak,
10 Alaska, ICE did not set bond, and Petitioner requested review of his custody by an Immigration
11 Judge. Petitioner has resided in the United States since 2007.
12

13 15. Respondent Laura Hermosillo is the Field Office Director for ICE’s Seattle Field
14 Office. The Seattle Field Office is responsible for local custody decisions relating to noncitizens
15 charged with being removable from the United States. The Seattle Field Office’s area of
16 responsibility includes Alaska, Oregon, and Washington. Respondent Hermosillo is a legal
17 custodian of Petitioner and is sued in her official capacity.
18

19 16. Respondent Bruce Scott is employed by the private corporation The GEO Group,
20 Inc., as Warden of the NWIPC, where Petitioner is detained. He has immediate physical custody
21 of Petitioner. He is sued in his official capacity.
22

23 17. Respondent Kristi Noem is sued in her official capacity as the Secretary of the
24 Department of Homeland Security (“DHS”). She is the cabinet-level secretary responsible for
25 all immigration enforcement in the United States.
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27

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1 18. Respondent Pamela Bondi is sued in her official capacity as the Attorney General
2 of the United States. She has responsibility over the Executive Office for Immigration Review,
3 which decides removal cases and applications for relief from removal.

4 19. Respondent U.S. Department of Homeland Security is the federal agency that has
5 authority over the actions of ICE.
6

7 **FACTUAL BACKGROUND**

8 20. Petitioner is a noncitizen who entered the United States as a lawful permanent
9 resident in 2007. Exhibit A.

10 21. He has resided in the United States since then and has two U.S. citizen children.

11 22. He was apprehended in March 2025 following his release from criminal
12 incarceration.
13

14 23. Respondents considered him subject to the mandatory detention provisions of 8
15 U.S.C. § 1182 and denied him release on bond.

16 24. Petitioner has been detained at the Tacoma Northwest Detention Center for the
17 entirety of his removal proceedings.
18

19 25. He sought relief before the Tacoma Immigration Court in the form of
20 Cancellation of Removal under Immigration and Nationality Act (“INA”) § 240A(a) and
21 Withholding of Removal under INA § 241(b)(3)(B).

22 26. Both applications were denied in a decision issued October 2, 2025 by the
23 Tacoma Immigration Court.
24

25 27. On November 26, 2025, Petitioner filed an application for a Stay of Removal
26 based on exceptional medical need. *See* Exhibit A.
27

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1 28. On December 6, 2025, ICE denied the Stay of Removal request. *See* Exhibit B.

2 29. On December 7, 2025, Philippine Airlines refused to allow Petitioner onboard the
3 flight ICE scheduled for his removal due to his medical condition. The airlines deemed him to
4 not be fit for travel.

5
6 30. Since being detained by ICE, Petitioner has complained of stomach and chest
7 pains, pain in his foot, and trouble breathing. Petitioner vomited blood and passed blood in his
8 stool for months before he was brought to the hospital by ICE. *See* Exhibits C and F.

9
10 31. Upon arriving at St. Joseph Medical Center in Tacoma on October 22, 2025,
11 Petitioner was diagnosed with tachycardia, ulcerative colitis, and osteomyelitis. *See* Exhibit C.

12 32. His medical documents show that his symptoms worsened progressively for five
13 months without comprehensive medical care. *Id.*

14 33. Petitioner had two amputations on his right foot due to a bone infection. His
15 records show that he lost thirty pounds in detention, developed anemia, a kidney injury, and a
16 vitamin D3 deficiency. *Id.*

17
18 34. He was released on November 12, 2025, after ten days of hospitalization, with
19 eleven medications and instructions to continue wound care on his amputations and return in six
20 weeks. *Id.*

21 35. Upon his return to detention at the Northwest Detention Center, Petitioner's
22 medical condition deteriorated. *See* Exhibit F.

23
24 36. At a medical appointment on November 26, 2025, his steroid dosage increased in
25 response to his passing blood in his stool and vomiting blood. *Id.*

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1 37. Petitioner was told to return in six weeks to receive an IV infusion of medication
2 intended to taper him off steroid medication. *Id.*

3 38. He returned to the Northwest Detention Center, where ICE medical staff
4 attempted to remove the stitches from the wounds on his right foot. *Id.*

5 39. In the process, his sutures opened back up and he was left with open wounds. *Id.*

6 40. In the following days, Petitioner was denied medical tape and gauze needed to
7 protect his open wounds while showering.

8 41. His tachycardia returned, he began passing blood again, and he is currently unable
9 to walk.

10 42. Following the filing of his Stay of Removal, Counsel continued to update
11 Respondents on Petitioner's medical condition. *See* Exhibit E.

12 43. Multiple attempts to seek alternative medical care went unanswered by
13 Respondents. Upon receiving the Stay of Removal denial, Counsel attempted to contact
14 Respondents through the telephone number provided in the denial. *Id.*

15 44. Counsel's calls went unanswered and Counsel was unable to leave a voicemail.

16 45. On December 7, 2025, Counsel was informed that Petitioner would be deported as
17 soon as possible. Petitioner files this petition and application for temporary restraining order in
18 response to Petitioner's imminent deportation.

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22 **MEMORANDUM OF LAW**

23 46. This Court has the authority to grant writs of habeas corpus to an individual in
24 custody if such custody is a "violation of the Constitution or laws or treaties of the United
25 States[.]" 28 U.S.C. § 2241(c)(3).

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1 47. Petitioner asserts that his continued detention violates the Due Process Clause of
2 the Fifth Amendment to the United States Constitution, which prohibits the federal government
3 from depriving any person of “life, liberty, or property, without due process of law[.]” U.S.
4 Const. Amend. V.

5
6 48. The right to due process extends to “all ‘persons’ within the United States,
7 including [non-citizens], whether their presence here is lawful, unlawful, temporary, or
8 permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Habeas corpus is “perhaps the most
9 important writ known to the constitutional law . . . affording as it does a *swift* and imperative
10 remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963)
11 (emphasis added). “The application for the writ usurps the attention and displaces the calendar
12 of the judge or justice who entertains it and receives prompt action from him within the four
13 corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation
14 omitted).

15
16 49. Here, the three-part test as stated in *Mathew v. Eldrige* applies. 424 U.S. 319, 332
17 (1976). This Court should consider, (1) the private interest that will be affected by the official
18 action; (2) the risk of an erroneous deprivation of such interest through the procedures used; and
19 (3) the government’s interest, including the function involved and the fiscal and administrative
20 burdens that the additional or substitute procedural requirement would entail. *Id.* At 335.

21
22 50. Additionally, Petitioner alleges that his substantive due process rights under the
23 Fifth and Fourteenth Amendment have been violated.

24
25 **A. The Government has violated Mr. Sorio’s procedural due process rights.**

26 i. Petitioner has a protected interest in his liberty.

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1 51. Petitioner's interest in not being detained while his medical care is ongoing is
2 "the most elemental of liberty interests." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004).
3

4 52. Petitioner has been detained since March 2025 and has developed multiple
5 medical conditions as a result of medical neglect.
6

7 53. Petitioner has a strong liberty interest in being free and procedural due process
8 requires that he be provided an opportunity to be heard as it related to his application for stay of
9 removal.
10

11 54. Petitioner's severe medical condition heightens his liberty interest to be free. Mr.
12 Sorio's ability to receive adequate medical care can only happen while free.

13 55. Petitioner is at high risk of serious injury or death due to the medical neglect that
14 occurred and is presently happening while in custody.

15 ii. The risk of erroneous deprivation of liberty is high.
16

17 56. Petitioner has not received notice or opportunity to be heard since the
18 development of his serious medical conditions.

19 57. Following the denial of his Stay of Removal on December 6, 2025, Counsel
20 attempted to contact ICE officials for information regarding the denial but was not able to reach
21 anyone.
22

23 58. Upon information and belief, it appears that Petitioner's primary care physician
24 was not consulted in the decision to deny his Stay of Removal.

25 59. The failure to conduct a holistic review of his Stay of Removal puts him at a high
26 risk of erroneous deprivation of his protected liberty interest.
27

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1 iii. The government interest in civil detention is low.

2 60. The Government's interest in maintaining civil detention in the instant case is
3 minimal.

4 61. Various alternatives to detention exist to ensure compliance with ICE reporting
5 requirements and any administrative or financial burdens in releasing Petitioner with conditions
6 are far outweighed by the risk of erroneous deprivation of the liberty interest at issue. *Ortega v.*
7 *Bonnar*, 415 F.Supp. 3d 963, 970 (N.D.Cal. 2019).

8
9 **B. The Government has violated Mr. Sorio's substantive due process rights**

10 62. As stated above, the Fifth Amendment prohibits the deprivation of life, liberty or
11 property without due process of law. U.S. Const. amend. V.

12 63. The Supreme Court has held that the right to bodily autonomy is a fundamental
13 right protected by substantive due process. *See, e.g., Lawrence v. Texas*, 539 U.S. 558, 564, 123
14 S.Ct. 2472, 156 L.Ed.2d 508 (2003); *C.R.*, 835 F.3d at 1154. The fundamental right to bodily
15 autonomy includes the right to be free from physical injury, bodily restraint, and bodily
16 intrusions. *See, e.g., Ingraham v. Wright*, 430 U.S. 651, 673, 97 S.Ct. 1401, 51 L.Ed.2d 711
17 (1977)(physical restraint); *Rochin v. California*, 342 U.S. 165, 172, 72 S.Ct. 205, 96 L.Ed. 183
18 (1952) (forced stomach pumping); *Kennedy v. City of Ridgefield*, 439 F.3d 1055, 1061 (9th Cir.
19 2006) (physical injury); *Wood v. Ostrander*, 879 F.2d 583, 586, 589 (9th Cir. 1989)(personal
20 security and safety).

21 64. As a detainee under the care and custody of Respondents, Petitioner has a
22 fundamental right to adequate and comprehensive medical care. In this aspect, Respondent has
23
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1 failed to provide healthcare that prevents Petitioner's health from deteriorating further and
2 allows him to follow the order of the Immigration Judge.

3 65. Since his detention in March of 2025, Petitioner's health has steadily declined. He
4 began complaining of jaundice, severe abdominal pain, and passing blood in his stool on or
5 about July 2025. *See* Exhibit F. The treatment he received at the Northwest Detention Center,
6 where he was detained, resulted in increased internal bleeding and worsening of his condition.

7 66. On or about October 15 or 16, 2025, after being told he was healthy by medical
8 staff at Northwest Detention Center, Petitioner experienced extreme pain and was unable to
9 walk. At first, staff refused to send him to the emergency room. After three hours, Petitioner
10 was admitted to St. Joseph Medical Center in Tacoma and diagnosed with ulcerative colitis. He
11 was then returned to Northwest Detention Center, where he was not given the course of
12 medication prescribed to him.

13 67. On or about October 22, 2025, Petitioner's foot began to swell, and he was told
14 three times that he did not need medical attention. Upon examination, Petitioner was sent back
15 to St. Joseph's Medical Center where he was diagnosed with a bone infection. He had two
16 amputation surgeries to remove infected bone and was hospitalized for 22 days. Amputation
17 could have been prevented had he received care earlier.

18 68. Petitioner's ulcerative colitis, untreated for five months, resulted in severe
19 inflammation and ulcerations in his colon. *See* Exhibit C. Further neglect can lead to colon
20 cancer.

21 69. Following his return to the Northwest Detention Center, Petitioner continued to
22 experience a lack of adequate care resulting in continued passing of blood in his stool. When the
23

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1 stitches in his wound were removed by ICE, the medical staff reopened his wounds. Six days
2 after the removal, medical staff refused to redress his wound to prevent further infection.

3 70. Petitioner's experience in ICE custody has resulted in irreparable harm to his
4 health and further detention will significantly worsen his medical conditions. Petitioner is not fit
5 to travel the over twenty hours it will take to remove him to the Philippines. He cannot walk
6 unassisted and continues to pass blood in his stool. He reports episodes of tachycardia, which at
7 this time are unconfirmed because medical staff refuses to have him admitted to the hospital.
8 These violations of substantive due process put Petitioner's life in immediate danger.
9

10 **C. The Government Has Violated Mr. Sorio's Due Process Rights by Subjecting him to**
11 **Unconstitutionally punitive conditions of confinement.**
12

13 71. In the Ninth Circuit, to prevail on a claim of unconstitutionally punitive
14 conditions of confinement under the Due Process Clause of the Fifth Amendment, a detainee
15 must show: (i) the defendant made an intentional decision with respect to the conditions under
16 which the plaintiff was confined; (ii) those conditions put the plaintiff at substantial risk of
17 suffering serious harm; (iii) the defendant did not take reasonable available measures to abate
18 that risk, even though a reasonable official in the circumstances would have appreciated the
19 high degree of risk involved—making the consequences of the defendant's conduct obvious; and
20 (iv) by not taking such measures, the defendant caused the plaintiff's injuries. *Gutierrez-Lopez*
21 *v. Figueroa*, 462 F. Supp. 3d 973, 985–86 (D. Ariz. 2020).
22

23
24 72. Here, the Government respondents made an intentional decision with respect to
25 the conditions under which Mr. Sorio is detained by failing to implement responsive measures
26 to address petitioner's ulcerative colitis.
27

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1 73. In a November 20, 2024, report by the Office of Immigration Detention
2 Ombudsman (OIDO) stated that NWIPC failed to comply with their medical staffing level
3 requirements. Exhibit.

4 74. “OIDO remains concerned about the conditions and factors that lead to repeated
5 hunger strikes...” *Id.* At 31; *See Castro v. County of Los Angeles*, 833 F.3d 1070, 1085 (9th Cir.
6 2016) (a failure to act with respect to a known condition may constitute an intentional decision).

7 75. Here, ICE has failed to improve its medical care unit to adequately address
8 detainee medical concerns.
9

10 76. The inadequate health care conditions inside NWPIC put Mr. Sorio in a
11 substantial risk of serious harm which resulted in irreparable loss and injury.
12

13 77. ICE failed to take reasonable available measures such as taking Mr. Sorio’s
14 medical concerns seriously and instead ignored his complaints which started in July 2025.
15

16 78. ICE’s failure to adequately respond to Mr. Sorio’s medical concerns resulted in a
17 bone infection and partial amputation of his foot.

18 **CLAIM FOR RELIEF**

19 **Count I**

20 **Violation Of Fifth Amendment Right to Due Process
21 Procedural Due Process**

22 79. Petitioner repeats, re-alleges, and incorporates by reference each and every
23 allegation in the preceding paragraphs as if fully set forth herein.

24 80. The government may not deprive a person of life, liberty, or property without due
25 process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government
26 custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the
27

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1 Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653
2 (2001).

3 81. Mr. Sorio was deprived of his procedural due process rights when ICE denied his
4 stay of removal without any ability to appeal their decision before a neutral decisions maker.
5

6 82. Without an opportunity to be heard, Mr. Sorio was not able to present evidence of
7 medical opinions from non-ICE medical professionals.

8 83. Because of ICE’s decision to deny the stay of removal Mr. Sorio is at a high risk
9 of erroneous deprivation.

10 84. Accordingly, Mr. Sorio’s detention violates the Due Process Clause of the Fifth
11 Amendment.
12

13 **Count II.**
14 **Violation Of Fifth Amendment Right to Due Process**
15 **Substantive Due Process**

16 85. Petitioner repeats, re-alleges, and incorporates by reference each and every
17 allegation in the preceding paragraphs as if fully set forth here in.

18 86. Mr. Sorio has a fundamental right to bodily autonomy and bodily integrity.

19 87. This right was violated when he was denied medical care while in custody
20 causing irreparable bodily harm and loss of limbs.

21 88. This right is currently being violated due to the Governments’ failure to address
22 Mr. Sorio’s medical concerns regarding episodes of tachycardia.

23 89. Accordingly, Mr. Sorio’s detention violates the Due Process Clause of the Fifth
24 Amendment.
25

26 **Count III.**
27 **Violation Of Fifth Amendment Right to Due Process**

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1 **Unconstitutionally Punitive Conditions of Confinement**

2
3 90. Petitioner repeats, re-alleges, and incorporates by reference each and every
4 allegation in the preceding paragraphs as if fully set forth herein.
5

6 91. The government has a responsibility, and thereby, a legitimate interest in
7 providing for the basic human needs of the detainees held within its custody, such as food,
8 clothing, shelter, medical care, and reasonable safety. *DeShaney v. Winnebago County Dept. of*
9 *Social Services*, 489 U.S. 189, 200, 109 S.Ct. 998, 103 L.Ed.2d 249 (1989). Therefore,
10 conditions which pose an objectively unreasonable and substantial risk of serious harm to
11 detainee health or safety are not rationally related to a legitimate nonpunitive government
12 purpose. *See Castro v. County of Los Angeles*, 833 F.3d 1060, 1085 (9th Cir. 2016).
13

14 92. The medical neglect Mr. Sorio faced resulted in irreparable bodily injury
15 including the loss of limbs. Such deliberate indifference to his medical care violates the Fifth
16 Amendment due process clause.
17

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Mr. Sorio prays that this Court grant the following relief:

- 20 (1) Assume Jurisdiction over this matter;
- 21 (2) Issue an Order to Show Cause ordering Respondents to show cause within three days
22 as to why this Petition should not be granted as required by 28 U.S.C. § 2243;
- 23 (3) Grant Petitioner's Motion for a Temporary Restraining Order, restraining
24 Respondents from removing Mr. Sorio from the Western District of Washington
25 while he is medically unfit to travel.
26

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- 1 (4) Issue a Writ of Habeas Corpus ordering Respondents to release Mr. Sorio from
2 custody immediately under alternatives to detention so he can receive adequate
3 medical care prior to his deportation.
4
5 (5) Declare that Mr. Sorio's lack of opportunity to be heard or appeal before a neutral
6 decision maker regarding his his application for a stay of removal violates procedural
7 due process;
8
9 (6) Declare that Mr. Sorio's detention violated his substantive due process rights;
10
11 (7) Declare that the conditions of Mr. Sorio's detention is unconstitutionally punitive
12 such that it violates the due process clause;
13
14 (8) Award Mr. Soiro attorney's fees and costs under the Equal Access to Justice Act and
15 on any other basis justified under law; and
16
17 (9) Grant such other relief as may be just and reasonable.

18 Dated: December 8, 2025

19 /s/ Louise Carhart

20 Louise Carhart, Illinois Bar No. 6343214
21 Pro Hac Vice (pending)
22 Kempster, Corcoran, Quiceno & Lenz-Calvo, Ltd.
23 332 S Michigan Ave, Suite 1428
24 Chicago, IL 60604
25 312 341 9730
26 louise@kclc-ltd.com

27 /s/ Sam M Sueoka

28 Sam M Sueoka, WSBA No. 59949
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/s/ Peyton Jacobsen

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3 *Attorneys for Mr. Greggy Sorio*

4
5 **VERIFICATION OF PETITIONER**

6 On behalf of Greggy Sorio, the party in custody, I verify the facts contained in the Petition for
7 Writ of Habeas Corpus, upon information and belief, having reviewed the relevant records and
8 pleadings. Mr. Sorio has not verified the petition himself because he is presently in custody at
9 NWIPC.
10

11
12 12/8/25

13 Date

14 /s/ Louise Carhart

15 Louise Carhart, Illinois Bar No. 6343214
16 Pro Hac Vice (pending)
17 Kempster, Corcoran, Quiceno & Lenz-Calvo,
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27

28 **PETITION FOR WRIT OF HABEAS CORPUS**
(CASE NO. 2:25-cv-2492)

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