

The Honorable Judge Tana Lin

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

Greggy SORIO,

Petitioner,

v.

Laura HERMOSILLO, et al.,

Respondents.

Case No.: 2:25-cv-02492-TL

**PETITIONER'S REPLY TO
RESPONDENT'S OPPOSITION TO
PETITIONER'S MOTION FOR
TEMPORARY RESTRAINING ORDER**

Note on Motion Calendar: December 17, 2025

INTRODUCTION

Petitioner, Mr. Greggy Sorio, requests emergency relief in the form of a Temporary Restraining Order. Mr. Sorio's request for a temporary restraining order is twofold: (1) it asks the Court to enjoin Petitioner's removal; and (2) release him to seek adequate medical care and stabilize his health before his removal order is executed.

The contested evidence presented before the court paints a horrific picture of medical neglect on the part of NWIPC's medical staff. Dkt. 17. Decl of Petitioner. Mr. Sorio is not asking this court to change the conditions of release through a habeas corpus petition, but rather to release him to a hospital setting because his detention is not constitutional, and the medical neglect is causing continuous, ongoing harm. Additionally, Mr. Sorio argues that his

confinement amounts to punishment due to both the length of detention and the lack of medical

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me**

1 care. Mr. Sorio contends that his procedural due process rights have been violated because he
2 was not provided with any procedural safeguards prior to being subjected to the punitive
3 conditions. *Zadvydas v. Davis*, 533 U.S. 678, 682, 121 S. Ct. 2491 (2001); *Demore v. Hyung*
4 *Joon Kim*, 538 U.S. 510, 532, 123 S. Ct. 1708 (2003) (Kennedy, J., concurring)

5 Mr. Sorio still faces imminent risk of removal, despite the fact that a provisional TRO has
6 been granted to maintain the status quo. Mr. Sorio has a final order of removal, travel documents
7 have been gathered by ICE, and the government intends on executing his order of removal as
8 swiftly as possible, despite his medical condition. *See generally* Dkt. 14. The Government cannot
9 simply moot this issue by being subject to a TRO and habeas corpus litigation and conditionally
10 agreeing not to remove him as a part of the case. If that were the case, *any* TRO or emergency
11 relief asking the court to enjoin the Government from acting would be mooted if the government
12 simply stipulated temporarily not to do the act sought to be enjoined during the pendency of the
13 case. Thus, Mr. Sorio respectfully requests that this court grant Mr. Sorio's motion for a
14 temporary restraining order and release Mr. Sorio.

15 **STATEMENT OF FACTS**

16 Mr. Greggy Sorio entered the United States in 2007 as a lawful permanent resident. Dkt.
17 1. p.5. He was apprehended by Immigration and Customs Enforcement (ICE) following release
18 from criminal incarceration in March 2025 and transferred from his home in Alaska to the
19 Northwest ICE Processing Center (NWIPC) in Tacoma, Washington, where he remains today.
20 *Id.* Mr. Sorio's medical condition has rapidly deteriorated throughout detention. Dkt. 17. When
21 he entered NWIPC in March, he did not have any ongoing medical issues. Dkt 15. p.8. In July,

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 Mr. Sorio began experiencing “severe abdominal pain, yellowing of [the] skin, and bright red
2 blood in [his] stool.” Dkt. 17. Though he repeatedly reported these symptoms to medical
3 providers within NWIPC and requested additional care, medical staff refused to facilitate
4 emergency care. *Id.* By late August, Mr. Sorio had still not been taken to the hospital, despite
5 worsening and continuing symptoms exacerbated further by inappropriate medications provided
6 by NWIPC like laxatives, fiber supplements and polycarb fiber. *Id.*; *See Exhibit I. Declaration of*
7 *Dr. Genevieve Pagalilauan; See Exhibit J. Declaration of Dr. Laura Whitehill.*

8 In mid-October 2025, still having had no access to emergency care, Mr. Sorio’s condition
9 worsened to the point of extreme and debilitating pain. Dkt. 17. One evening in October, he
10 recalls crying and screaming in pain for hours before finally being taken to medical at NWPIC,
11 where he was told to go back to his cell and take ibuprofen. *Id.* Eventually, the medical providers
12 at NWPIC agreed to send him to the hospital, where he was diagnosed with ulcerative colitis. *Id.*
13 Doctors at St. Joseph Medical Center informed Mr. Sorio that his condition was serious and
14 could progress to cancer given the delays in care and overall lack of appropriate treatment. *Id.*
15 After returning to NWIPC, Mr. Sorio developed a bone infection in his foot. *Id.* He again
16 attempted to secure care at the facility but was denied three times before NWIPC staff agreed to
17 send him back to the hospital. *Id.* Mr. Sorio underwent two amputation surgeries to remedy the
18 bone infection – an outcome which could have likely been avoided with prompt care and
19 treatment. *See Exhibit I. Decl. of Dr. Pagalilauan; See Exhibit J. Decl. of Dr. Whitehill.* Mr.
20 Sorio remained in the hospital for 22 days. Dkt. 17.

1 Upon return to NWPIC on November 12, 2025, Respondents failed to provide adequate
2 follow-up care for the wound caused by the amputation surgeries. *Id.* Mr. Sorio's community in
3 detention filled in the gaps – doing their best to help him move around and to cover his wound
4 while he showered. *Id.* Mr. Sorio's abdominal pain and fatigue also did not ease, and yet he was
5 *still* not provided with prescribed medication. *Id.* On November 19, NWIPC personnel removed
6 Mr. Sorio's amputation stitches even though his wound had not healed properly. *Id.* The removal
7 took multiple hours, causing Mr. Sorio extreme pain and discomfort. *Id.* After the stitches were
8 removed, Mr. Sorio requested materials to dress and clean his wound but was denied. *Id.*

9 At a follow up appointment on November 26, a St. Joseph's doctor informed Mr. Sorio
10 that he will have ulcerative colitis for the remainder of his life. *Id.* Mr. Sorio was told that failing
11 to take medication and regularly check in with medical professionals could result in cancer and
12 loss of life. *Id.* Mr. Sorio's health continued to decline rapidly. *Id.* He began having trouble
13 breathing and experiencing sharp chest pains, which prevented him from sleeping. *Id.* His chest
14 pain raised concern of blood clot or pulmonary embolism. *Id.* Also on November 26, Mr. Sorio
15 filed a request for a Stay of Removal with Respondents, citing his ongoing medical concerns and
16 the need for further care prior to being placed on a long flight to the Philippines. *Id.*

17 All the while, Respondents were actively arranging his removal to the Philippines. *See*
18 *generally* Dkt. 14. On December 6, 2025, Respondents denied Mr. Sorio's request for a Stay of
19 Removal, noting that "the totality of the circumstances do not support a favorable exercise of
20 discretion." Dkt. 1. Attachment 2. Notably, the denial did not contain any specific indication that
21 Mr. Sorio's medical issues had been reviewed or considered and did not contain reasoning to

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 support why his medical condition did not rise to the level of “urgent humanitarian” reasons. *Id.*
2 Instead, despite Mr. Sorio’s ongoing health issues and upcoming appointments scheduled for
3 later in December, “ICE Health Services Corps (“IHSC”) deemed Petitioner medically cleared
4 for travel.” Dkt. 14 at 3. On December 7, 2025, Respondents transported Petitioner to the airport
5 and attempted to place him on a Philippines Airlines flight to effectuate his removal. *Id.*
6 Ultimately, Mr. Sorio was removed from the flight after ICE failed to provide Philippines
7 Airlines with proper medical clearance. Dkt.14.

8 When Mr. Sorio entered NWPIC in March, he was a healthy 37-year-old with no
9 particular medical concerns or conditions. Dkt 15. p.8. Now, after nine months of detention at
10 NWPIC, he has had two partial foot amputations, been diagnosed with severe ulcerative colitis
11 and acute blood loss anemia, suffered malnutrition and severe weight loss, developed a long-
12 term risk of colon cancer and other permanent needs, and endured significant physical and
13 emotional pain. Dkt. 17. Mr. Sorio’s medical records confirm these facts. Dkt. 1 at Ex. C.¹

14 **ARGUMENT**

15 **I. 8 U.S.C. § 1252(g) does not bar this Court from hearing Mr. Sorio’s claims.**

16 Respondent claims that this Court does not have jurisdiction over the instant matter as 8
17 U.S.C. § 1252 precludes judicial review of “removal orders.” Dkt 12. Subsection (g) limits the
18 court’s jurisdiction to review cases or claims “arising from the decision or action by the Attorney
19 General to commence proceedings, adjudicate cases, or execute removal orders against any alien
20

21 ¹ This reply is supported further by the declaration of Dr. Genevieve Pagalilauan, and declaration of Dr. Laure
Whitehill.

1 under this chapter.” 8 U.S.C. § 1252 (g). Mr. Sorio’s due process argument does not seek judicial
2 review of any decision arising from the Attorney General to execute a removal order. This court
3 has previously ruled that “[s]ection 1252(g) does not divest courts of jurisdiction to hear those
4 cases involving ‘a purely legal question, which does not challenge the Attorney General’s
5 discretionary authority[.]’” *Fatty v. Nielsen*, No. C17-1535-MJP, 2018 U.S. Dist. LEXIS 121852
6 (W.D. Wash. July 20, 2018) (citations omitted) quoting *United States v. Hovsepian*, 359 F.3d
7 1144, 1155 (9th Cir. 2004). July 20, 2018).

8 Section 1252(b)(9), likewise, “does not bar claims that are ‘independent of or collateral to
9 the removal process.’” *Rodriguez v. Bostock*, No. 3:25-CV-05240-TMC, 2025 WL 2782499, at
10 *9 (W.D. Wash. Sept. 30, 2025) (quoting *J.E.F.M. v. Lynch*, 837 F.3d 1026, 1032 (9th Cir. 2016)
11 and citing *Jennings*, 583 U.S. at 293). “The Supreme Court has ... instructed that § 1252(b)(9) is
12 a ‘targeted’ and ‘narrow’ provision that ‘is certainly not a bar where ... the parties are not
13 challenging any removal proceedings.’” *Gonzalez*, 975 F.3d at 810. In sum, the jurisdiction-
14 stripping provisions of sections 1252(g) and 1252(b)(9) do not apply here because Petitioner
15 does not challenge the removal proceedings; he challenges the legality of his detention. The
16 Court thus has jurisdiction to review Petitioner’s motion for a temporary restraining order.
17 *B.D.A.A. v. Bostock*, 6:25-CV-02062-AA, 2025 WL 3484912, at *4 (D. Or. Dec. 4, 2025).

18
19 **II. Mr. Sorio’s claims fall within the core of 28 U.S.C. § 2241.**

20 This court is authorized to grant a writ of habeas corpus under 28 U.S.C. § 2241 where a
21 petitioner is “in custody under or by color of the authority of the United States...in violation of

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 the Constitution or laws or treaties of the United States.”28 U.S.C. § 2241(c)(1), (3). “The writ of
2 habeas corpus historically provides a remedy to non-citizens challenging executive detention.”
3 *Trinidad y Garcia v. Thomas*, 683 F.3d 952, 956 (9th Cir. 2012).

4 The Supreme Court has not explicitly foreclosed the use of habeas corpus for conditions-
5 of-confinement claims. *See Ziglar v. Abbasi*, 582 U.S. — (2017) (leaving open the question of
6 whether alien detainees challenging “large-scale policy decisions concerning the conditions of
7 confinement imposed...might be able to challenge their confinement conditions via a petition for
8 writ of habeas corpus.”). As such, the door to conditions of confinement has been left open for
9 district courts to rule on a case-by-case basis because there may be specific circumstances when
10 a challenge to the conditions is properly brought in a petition for writ of habeas corpus.

11 Respondents rely heavily on *Pinson v. Carjaval*, 69 F.4th 1059 (2023). But *Pinson* is
12 distinguishable because it dealt with federal prisoners and Eighth Amendment claims. *Id.* at
13 1075. *Pinson* draws reasoning from *Brown v. Plata*, 563 U.S. 493 (2011), another prisoner
14 related case. In *Brown*, plaintiffs alleged constitutional violations against an entire prison system
15 and sought relief under the Prison Litigation Reform Act. *Id.* at 499. Ultimately, the United
16 States Supreme Court ruled in *Brown* that some of the conditions of confinement issues could be
17 resolved by measures that fall short of release, i.e., transfer to another prison. *Id.* at 511.

18 In contrast, Mr. Sorio is not seeking relief from confinement that arose from a criminal
19 sentence. Mr. Sorio is subject to civil immigration detention and was not afforded any of the
20 procedural protections given to criminal defendants. Because Mr. Sorio is situated differently,
21 and because he makes different constitutional claims, his arguments should be analyzed

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Seattle, WA 98118
ssueoka@proton.me

1 independently of *Pinson*. Further, to deny Mr. Sorio the ability to proceed with his claim under
2 28 U.S.C. § 2241 would be akin to denying him any ability to pursue relief at all. While
3 Congress has provided a specific damages remedy for plaintiffs whose constitutional rights were
4 violated by *state* officials, Congress provided no corresponding remedy for constitutional
5 violations by agents of the Federal Government. *Ziglar v. Abbasi*, 582 U.S. 120, 121 (2017). Mr.
6 Sorio cannot use a § 1983 claim to seek remedy for his grievances against federal agents. In
7 citing to *Pinson*, Respondents also indicate that Mr. Sorio could instead pursue an Eighth
8 Amendment claim under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*,
9 403 U.S. 388 (1971). But Mr. Sorio is pursuing due process claims, and it is well established that
10 “expanding the *Bivens* remedy is now considered a ‘disfavored’ judicial activity.” *Ziglar*, 582
11 U.S. at 121 (2017); *see also FDIC v. Myer*, 510 U.S. 471, 486 (1994) (stating that *Bivens* claims
12 against Federal agencies are not permitted); *Corr. Servs. Corp. v. Malesko*, 534 U.S. 61, 74
13 (2001); *Minneci v. Pollard*, 565 U.S. 118, 131 (2012). Mr. Sorio does in fact have due process
14 rights under the Fifth Amendment, despite Respondents best efforts to render these rights
15 meaningless by denying him any avenue to seek relief when those rights are violated.

16 **III. The Court should grant Mr. Sorio’s Motion for Temporary Restraining Order.**

17 A petitioner seeking a preliminary injunction must establish that: (1) he is likely to
18 succeed on the merits; (2) he is likely to suffer irreparable harm in the absence of preliminary
19 relief; (3) the balance of equities tips in his favor; and (4) an injunction is in the public interest.

20 *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008); *Stuhlbarg Int’l Sales Co. v. John D.*
21 *Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001) (noting that preliminary injunction and TRO

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 standards are “substantially identical”). Under the Ninth Circuit’s “sliding scale’ approach[,]
2 ...the elements of the preliminary injunction test are balanced, so that a stronger showing of one
3 element may offset a weaker showing of another.” *All. For the Wild Rockies v. Cottrell*, 632 F.2d
4 1127, 1131 (9th Cir. 2011).

5 *a. Mr. Sorio is likely to succeed on the merits of his claims.*

6 Mr. Sorio is likely to succeed on his claims that his continued detention violates
7 substantive due process. “A civil detainee awaiting adjudication is entitled to conditions of
8 confinement that are not punitive.” *Jones v. Blanas*, 393 F.3d 918, 933 (9th Cir. 2004). The
9 Supreme Court held more than a century ago that civil detention of a removeable noncitizen
10 violates the Constitution if it is punitive and if they have not been afforded the procedural
11 protections the Constitution demands before the imposition of punishment. *Wong Wing v. United*
12 *States*, 163 U.S. 228, 237–38, 16 S.Ct. 977, 41 L.Ed. 140 (1896).

13 Detention can become punitive if it is excessive in relation to the government's regulatory
14 purposes, and that both the duration of detention and the conditions of the individual's
15 confinement inform this analysis. *Doe v. Becerra*, 732 F. Supp. 3d 1071, 1079 (N.D. Cal. 2024).
16 The medical neglect in Mr. Sorio’s case amounts to punishment for which Mr. Sorio did not
17 receive due process of law. The conditions inside NWIPC are at least equivalent if not worse
18 than conditions afforded to criminal prisoners.

19 When a detainee “is confined in conditions identical to, similar to, or more restrictive
20 than, those in which ... criminal counterparts are held,” courts “presume that the detainee is being
21 subjected to ‘punishment.’” *Jones*, 393 F.3d at 923. If conditions of civil confinement are

1 equivalent to or more restrictive than criminal detention or civil post-commitment detention, they
2 are presumptively punitive and the burden shifts to the government “to show (1) legitimate, non-
3 punitive interests justifying the conditions of the detainee's confinement and (2) that the
4 restrictions imposed are not excessive in relation to these interests.” *King v. Cnty. of L.A.*, 885
5 F.3d 548, 557 (9th Cir. 2018) (citing *Jones*, 393 F.3d at 933).

6 Here, Mr. Sorio, as a result of the conditions of his confinement, suffered two partial foot
7 amputations, severe ulcerative colitis, acute blood-loss anemia, malnutrition and severe weight
8 loss, long-term risk of colon cancer, significant physical and emotional pain, and permanent and
9 ongoing medical needs. Mr. Sorio's confinement is presumptively punitive because immigration
10 detention at NWIPC is at least equivalent to criminal detention.² The burden must shift to the
11 Government to show a legitimate, non-punitive interest and that the restrictions imposed are not
12 excessive. *King*, 885 F.3d at 557.

13 The government will likely not be able to rebut this presumption because there is no
14 legitimate non-punitive government purpose for medical neglect nor punitive conditions for civil
15 detainees. *see also Kingsley v. Hendrickson*, 576 U.S. 389, 135 S. Ct. 2466, 2473, 192 L.Ed.2d
16 416 (2015) (government action amounts to punishment if it is “objectively unreasonable”). Some
17 level of discomfort is an unavoidable consequence of detention, and the Government does have
18 an interest in enforcing its immigration policies; however, it may only achieve those interests in a

19 _____
20 ² See “Conditions inside Northwest ICE Processing Center ‘a nightmare’”, *King 5 News* (October 31, 2025),
21 available at <https://www.king5.com/article/news/community/facing-race/washington-immigration-nightmare-conditions-inside-ice-detention-center-tacoma/281-1c20754c-93c6-4514-a989-e39ce5cf89d3>; See also, “Inside
22 WA’s ICE detention center, where you could be kept for days or years”, *Seattle Times* (October 12, 2025), available
23 at <https://www.seattletimes.com/seattle-news/inside-wa-ice-detention-center-where-you-could-stay-for-days-or-years>
(attached as Exhibit K).

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 way that does not subject Mr. Sorio to harsh prison-like conditions. The Government will also
2 likely not be able to show that medical neglect is not an excessive restriction. Mr. Sorio's
3 physical injuries will impact and restrict him for the rest of his life. Dkt. 17;

4 Mr. Sorio is likely to succeed on the merits utilizing the factors used in *Castro*. First, the
5 Respondent's made an intentional decision with respect to the conditions under which the Mr.
6 Sorio was confined. A failure to act with respect to a known condition may constitute an
7 intentional decision. *Castro v. County of Los Angeles*, 833 F.3d 1070, 1085 (9th Cir.2016). Here,
8 the Respondent's failure to act in accordance with known standards of care and timely respond to
9 Mr. Sorio's complaints of bloody stool, yellowing of skin, and severe abdominal pain constitutes
10 an intentional decision. Mr. Sorio put the Respondents on notice several times starting on July
11 25, 2025, that he was in need of medical care and wanted to be sent to the hospital. Dkt. 13; Dkt.
12 17. The Respondent's do not contest the fact that Mr. Sorio placed them on notice several times
13 about his health concerns. Dkt. 13. Instead, they argue that waiting three months to send him to
14 the hospital was a timely response. Dkt. 13.

15 Second, the conditions put Mr. Sorio at substantial risk of suffering serious harm. The
16 Respondent's failure to respond to Mr. Sorio's complaints put him at a substantial risk of
17 suffering. The medical declarations state that Mr. Sorio's amputations were more likely than not
18 due to the delay in care for his GI issues, allowing the infection to spread throughout Mr. Sorio's
19 body. Exhibit I. *Decl. of Dr. Pagalilauan*. p.2-3. The loss of a body part undoubtably constitutes
20 serious and irreparable harm. Further, Mr. Sorio experienced excruciating pain for months before
21 he was offered any care to address and mitigate his pain. Dkt. 17. This caused Mr. Sorio mental

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1 anguish and hopelessness. Mr. Sorio now requires long-term care for ulcerative colitis. His
2 amputations necessitate physical therapy to learn how to walk again. Exhibit I. *Decl. of Dr.*
3 *Pagalilauan*. Dr. Pagalilauan states in her declaration that in her medical opinion “Mr. Sorio did
4 not receive timely or adequate medical treatment for his progressively worsening condition.” *Id.*

5 Third, the Respondent’s did not take reasonable available measures to abate that risk.
6 Sending Mr. Sorio to the hospital for emergency care was a reasonable measure available to the
7 Respondents from the first day that Mr. Sorio reported having blood in his stool, yellowing skin,
8 and severe abdominal pain. In hindsight, it is clear that on July 25, 2025, Mr. Sorio had an
9 infection that required immediate care. Exhibit I. *Decl. of Dr. Pagalilauan*. The ICE National
10 Detention Standards require ICE to provide detainees with “emergency care” and “timely
11 responses to medical complaints.” National Detention Standard 4.3 Medical Care (2025)(Exhibit
12 L). Mr. Sorio complained of blood, severe abdominal pain, and yellowing of his skin on July 25,
13 2025. Respondents provided him with ibuprofen, which increased his bleeding and caused acute
14 blood loss anemia. Dkt. 17. It was not until Mr. Sorio was in a state of medical emergency did
15 Respondents timely respond to Mr. Sorio’s complaints. *Id.* Lastly, by not taking such measures,
16 Respondents caused the plaintiff’s injuries. Respondents failure to comply with their own
17 National Detention Standards and timely respond to Mr. Sorio’s complaints caused his pain and
18 suffering, a bone infection, amputation of his toes, severe ulcerative colitis, acute blood-loss
19 anemia, long term risk of colon cancer, malnutrition, inability to walk, and significant emotional
20 pain. Dr. Whitehill and Dr. Pagalilauan’s declarations support the causation of the Respondent’s
21 lack of timely medical care. Exhibit I. *Decl. of Dr. Pagalilauan*; Exhibit J. *Decl. of Dr. Whitehill*.

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

1 *b. Mr. Sorio is likely to suffer irreparable harm in the absence of preliminary relief.*

2 This Court should issue a TRO because “immediate and irreparable injury” is occurring
3 and will continue in the absence of an order. Fed. R. Civ. Pro. 65(b). It is well established that
4 the deprivation of constitutional rights “unquestionably constitutes irreparable injury.”
5 *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347,
6 373 (1976)). Where the “alleged deprivation of a constitutional right is involved, most courts
7 hold that no further showing of irreparable injury is necessary.” *Warsoldier v. Woodford*, 418
8 F.3d 989, 1001-02 (9th Cir. 2005) (citing 11A Charles Alan Wright et al., *Federal Practice and*
9 *Procedure*, § 2948.1 (2d ed. 2004)). “Unlawful detention certainly constitutes ‘extreme or very
10 serious damage, and that damage is not compensable in damages.” *Hernandez v. Sessions*, 872
11 F.3d 976, 999 (9th Cir. 2017). As described above, Mr. Sorio’s detention is violating his rights to
12 Due Process and the Court should find that this factor tips in his favor.

13 *c. The balance of the equities tips in Mr. Sorio’s favor and granting Mr. Sorio’s request for*
14 *injunctive relief is in the public interests.*

15 “It is always in the public interest to prevent violation of a party’s constitutional rights.”
16 *Porretti v. Dzurenda*, 11 F.4th 1037, 1050 (9th Cir. 2021). The balance of equities tips away from
17 the Government when it does not show that it will be harmed by a TRO. *See Rodriguez v.*
18 *Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013) (finding balance of equities favored granting a
19 preliminary injunction where “[t]he government provide[d] almost no evidence that it would be
20 harmed in any way by the district court’s order, other than its assertion that the order enjoins
21 ‘presumptively lawful’ government activity.”). Here, Respondents have provided no evidence
22 that it will be harmed in any way by a TRO, other than that the order will enjoin lawful

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Seattle, WA 98118
ssueoka@proton.me

1 government activity. In contrast, Mr. Sorio has been subjected to horrific and systemic
2 mistreatment and medical neglect during his detention at the NWIPC, and Respondents have
3 produced nothing concrete to show that he will have access to the care he needs to stabilize his
4 medical conditions while detained.

5 **CONCLUSION**

6 For the reasons outlined above, Mr. Sorio respectfully requests that this Court grant his
7 Motion for a Temporary Restraining Order, enjoin the Government from removing him from the
8 United States and order his immediate release.

9
10 Respectfully submitted on December 16, 2025,

11 /s/ Sam M Sueoka

12 Sam M Sueoka, WSBA No. 59949
13 PO Box 18011
Seattle, WA 98118
ssueoka@proton.me

14 /s/ Peyton Jacobsen

15 Peyton Jacobsen, WSBA No. 60181
16 PO Box 18011
Seattle, WA 98118
HYPERLINK "mailto:Consultlegal.ss@proton.me" Consultlegal.ss@proton.me

17 *Local Counsel for Mr. Sorio*

18 /s/ Louise Carhart

19 Louise Carhart, 6343214
332 S. Michigan Ave., Ste 1428
Chicago, IL 60604
20 LouiseC@klc-ltd.com

21 *Pro Hac Vice Counsel for Mr. Sorio*

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P.O. Box 18011
Seattle, WA 98118
ssueoka@proton.me

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I certify that this reply contains 3,914 words, in compliance with the Local Civil Rules.

/s/Peyton Jacobsen
WSBA No. 60181
Local Counsel for Mr. Sorio