

The Honorable Judge Tana Lin

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**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-2492

**TRAVERSE AND RESPONSE TO
RESPONDENTS' RETURN TO PETITION
FOR WRIT OF HABEAS CORPUS**

**TRAVERSE AND RESPONSE TO
RESPONDENTS' RETURN TO PETITION FOR
WRIT OF HABEAS CORPUS**

(CASE NO. 2:25-cv-2173)

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1 **INTRODUCTION**

2 Petitioner Greggy Sorio challenges his confinement due to severe medical neglect that
3 resulted in substantial bodily harm, which violates his rights to substantive due process. In March
4 2025, Mr. Sorio entered NWIPC a perfectly healthy individual. Several months later, he was
5 diagnosed with severe ulcerative colitis, had portions of his foot amputated due to a bone
6 infection, and has developed long term health complications that will be with him for the rest of
7 his life. And yet, Respondents assert that he has received constitutionally adequate medical care.
8 Mr. Sorio disagrees and respectfully asks this court to grant his petition for a writ of habeas
9 corpus. To simplify the briefing, Mr. Sorio incorporates by references Petitioner’s Reply to the
10 Temporary Restraining Order, see Dkt. 19.

11 Mr. Sorio asks this Court to utilize two separate tests to analyze his claims of
12 unconstitutional confinement. *See King v. Cnty. Of L.A.*, 885 F.3d 548, 557 (9th Cir. 2018) and
13 *Gutierrez-Lopez v. Figueroa*, 462 F. Supp. 3d 973, 985–86 (D. Ariz. 2020). Respondents
14 incorrectly ask this court to use a deliberate indifference standard when analyzing Mr. Sorio’s
15 unconstitutional confinement claims. The appropriate analysis is outlined in *King v. Cnty. Of*
16 *L.A.*, 885 F.3d 548, 557 (9th Cir. 2018) and *Gutierrez-Lopez v. Figueroa*, 462 F. Supp. 3d 973,
17 985–86 (D. Ariz. 2020). Lastly, Mr. Sorio’s submits supplemental declarations to support his
18 argument that the conditions of NWIPC amount to punishment. *See Exhibit M; Decl. of Troy*
19 *Osaki, Exhibit N; Decl. of Nehral Maliwat.*

20 **STATEMENT OF FACTS**

21
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1 Mr. Greggory Sorio entered the United States in 2007 as a lawful permanent resident. Dkt
2 1. P. 5. He was apprehended by Immigration and Customs Enforcement (ICE) following release
3 from criminal incarceration on March 1, 2025 and transferred from his home in Alaska to the
4 Northwest ICE Processing Center (NWIPC) in Tacoma, Washington, where he remains today.
5 *Id.* Mr. Sorio's medical condition has rapidly deteriorated throughout his time in immigrant
6 detention, and he has had extreme difficulty accessing adequate care. *See* Dkt. 17. When he
7 entered NWIPC in March, he did not have any ongoing medical issues. Dkt. 15. p. 8. In July, Mr.
8 Sorio began experiencing "severe abdominal pain, yellowing of [the] skin, and bright red blood
9 in [his] stool." Dkt. 17. Though he repeatedly reported these symptoms to medical providers
10 within NWIPC and requested additional attention, medical staff refused to facilitate emergency
11 care. *Id.* By late August, Mr. Sorio had still not been taken to the hospital, despite worsening and
12 continuing symptoms, which were further exacerbated by inappropriate medications provided by
13 NWIPC, such as laxatives and fiber supplements. *Id.*; *see also* Dkt. 20, ex. 1, 2.

14 In mid-October 2025, still having had no access to emergency care, Mr. Sorio's condition
15 worsened to the point of extreme and debilitating pain. Dkt. 17. One evening in October, he
16 recalls crying and screaming in pain for hours before finally being taken to the medical team at
17 NWIPC, where he was told to return to his cell and take ibuprofen. *Id.* Eventually, the medical
18 providers at NWIPC agreed to send him to the hospital, where he was diagnosed with ulcerative
19 colitis. *Id.* Doctors at St. Joseph Medical Center informed Mr. Sorio that his condition was
20 serious and could progress to cancer given the delays in care and overall lack of appropriate
21 treatment. *Id.* After returning to NWIPC, Mr. Sorio developed a bone infection in his foot. *Id.*

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1 Again, he attempted to secure care at the facility but was denied three times before NWIPC
2 agreed to send him back to the hospital. *Id.* Mr. Sorio underwent two amputation surgeries to
3 remedy the bone infection – an outcome which likely could have been avoided with prompt care
4 and treatment. Dkt. 19, ex. 3. Mr. Sorio remained in the hospital for 22 days. Dkt. 17.

5 Upon return to NWIPC on November 12, 2025, Respondents failed to provide adequate
6 follow-up care for the wound caused by the amputation surgeries. *Id.* Mr. Sorio’s community in
7 detention attempted to fill the gaps, doing their best to help him move around and to cover his
8 wound while he showered. *Id.* Mr. Sorio’s abdominal pain and fatigue did not ease, and he was
9 still not provided with prescribed medications. *Id.* On November 19, NWIPC personnel removed
10 Mr. Sorio’s amputation stitches, even though his wound had not healed properly. *Id.* The
11 removal took multiple hours, causing Mr. Sorio extreme pain and discomfort. *Id.* After the
12 stitches were removed, Mr. Sorio requested materials to dress and clean his wound. *Id.* His
13 requests were denied. *Id.*

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

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1 All the while, Respondents were actively arranging his removal to the Philippines. *See*
2 *generally* Dkt. 14. On December 6, 2025, Respondents denied Mr. Sorio’s request for a Stay of
3 Removal, noting that “the totality of the circumstances do not support a favorable exercise of
4 discretion.” Dkt. 1. Attachment 2. Notably, the denial did not contain any specific indication that
5 Mr. Sorio’s medical issues had been reviewed or considered and did not contain reasoning to
6 support why his medical condition did not rise to the level of “urgent humanitarian” reasons. *See*
7 *id.* Instead, despite Mr. Sorio’s ongoing health issues and upcoming appointments scheduled for
8 later in December, “ICE Health Services Corps (“IHSC”) deemed Petitioner medically cleared
9 for travel.” Dkt. 14 at 3. On December 7, 2025, Respondent transported Petitioner to the airport
10 and attempted to place him on a Philippines Airlines flight to effectuate his removal. *Id.*
11 Ultimately, Mr. Sorio was removed from the flight after ICE failed to provide Philippines
12 Airlines with proper medical clearance. Dkt. 14.

13 When Mr. Sorio entered NWIPC in March, he was a healthy 37-year-old with no
14 particular medical concerns or conditions. Dkt. 15 p. 8. Now, after nine months of detention at
15 NWIPC, he has had two partial foot amputations, been diagnosed with severe ulcerative colitis
16 and acute blood loss anemia, suffered malnutrition and severe weight loss, developed a long-
17 term risk of colon cancer and other permanent needs, and endured significant physical and
18 emotion pain. Dkt. 17. Mr. Sorio’s medical records confirm these facts. Dkt. 20, ex. 1, 2.
19 Independent review of Mr. Sorio’s medical records suggests that he needs ongoing care to
20 stabilize prior to travel and show that Mr. Sorio’s medical condition worsened severely over the
21 past months due to Respondents’ failure to provide adequate medical support for his needs. *Id.*

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ARGUMENT

I. This Court has jurisdiction to hear Mr. Sorio’s habeas corpus petition.

Respondents raise two separate jurisdictional challenges to Mr. Sorio’s habeas corpus petition, claiming that this Court lacks authority to review his claims. Mr. Sorio contests, in response, that (1) 8 U.S.C. § 1252(g) does not preclude review of this case and (2) his claims fall within the core of 28 U.S.C. § 2241.

a. 8 U.S.C. § 1252(g) does not preclude review.

Federal courts have authority to grant writs of habeas corpus to an individual in custody if that custody violates “the Constitution or laws or treaties of the United States[.]” 28 U.S.C. § 2241(c)(3). This Court has jurisdiction over this case because Mr. Sorio is in custody in the United States and Mr. Sorio claims that his continued detention, coupled with the lack of medical care and continuous worsening of his health, violates the Fifth Amendment of the U.S. Constitution, which prohibits the federal government from depriving any person of “life, liberty, or property, without due process of law[.]” U.S. Const. Amend. V. This right extends to “all ‘persons’ within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

Respondent claims that this Court does not have jurisdiction over the instant matter as 8 U.S.C. § 1252 precludes judicial review of “removal orders.” DKT 12. Mr. Sorio is not seeking judicial review of his removal order. Subsection (g) limits the court’s jurisdiction to review cases or claims “arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter.” 8

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1 U.S.C. § 1252 (g). Mr. Sorio’s due process argument does not seek judicial review of any
2 decision arising from the Attorney General to execute a removal order.

3 Mr. Sorio argues that his continued detention, coupled with the lack of care and resulting in
4 ongoing worsening of his health due to lack of care, violates his rights to due process.

5 Respondents argue that “Congress has spoken clearly, emphatically, and repeatedly, providing
6 that “no court” has jurisdiction over “any cause or claim” arising from the execution of removal
7 orders, “notwithstanding any other provision of law,” whether “statutory or nonstatutory,”
8 including habeas, mandamus, or the All Writs Act. 8 U.S.C. § 1252(g).” This argument rests on a
9 misreading of Petitioner’s claims, which “constitute general collateral challenges to
10 unconstitutional practices and policies” used by Respondents and are not barred under Section
11 1252(g). *Barahona-Gomez v. Reno*, 236 F.3d 1115, 1118 (9th Cir. 2001). Mr. Sorio does not
12 seek review of anything directly related to his removal proceedings. Instead, he seeks judicial
13 review of his continued confinement under unconstitutional conditions created by Respondents
14 failure to provide adequate medical care. Section 1252(b)(9), likewise, “does not bar claims that
15 are ‘independent of or collateral to the removal process.’” *Rodriguez v. Bostock*, No. 3:25-CV-
16 05240-TMC, 2025 WL 2782499, at *9 (W.D. Wash. Sept. 30, 2025) (quoting *J.E.F.M. v. Lynch*,
17 837 F.3d 1026, 1032 (9th Cir. 2016) and citing *Jennings*, 583 U.S. at 293). “The Supreme Court
18 has ... instructed that § 1252(b)(9) is a ‘targeted’ and ‘narrow’ provision that ‘is certainly not a
19 bar where ... the parties are not challenging any removal proceedings.’ ” *Gonzalez*, 975 F.3d at
20 810 (quoting *U.S. Dep’t of Homeland Sec. v. Regents*, 592 U.S. at 19). In sum, the jurisdiction-
21 stripping provisions of sections 1252(g) and 1252(b)(9) do not apply here because Petitioner

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1 does not challenge the removal proceedings, he challenges the legality of his detention. The
2 Court thus has jurisdiction to review Petitioner's motion for a temporary restraining order.
3 *B.D.A.A. v. Bostock*, 6:25-CV-02062-AA, 2025 WL 3484912, at *4 (D. Or. Dec. 4, 2025) The
4 Government has not presented any persuasive argument that the Court lacks the jurisdiction to
5 review this constitutional claim.

6 *b. Mr. Sorio's claims are appropriate for petition under 28 U.S.C. § 2241.*

7 Mr. Sorio challenges the legality of his physical confinement, arguing that Respondents have
8 failed to provide him with adequate care for his health problems that were caused by his
9 detention. This court is authorized to grant a writ of habeas corpus under 28 U.S.C. § 2241 where
10 a petitioner is "in custody under or by color of the authority of the United States...in violation of
11 the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(1), (3). "The writ
12 of habeas corpus historically provides a remedy to non-citizens challenging executive detention."
13 *Trinidad y Garcia v. Thomas*, 683 F.3d 952, 956 (9th Cir. 2012). The Supreme Court has not
14 explicitly foreclosed the use of habeas corpus for conditions-of-confinement claims. *See Ziglar v.*
15 *Abbasi*, 582 U.S. — (2017) (leaving open the question of whether alien detainees challenging
16 "large-scale policy decisions concerning the conditions of confinement imposed...might be able
17 to challenge their confinement conditions via a petition for writ of habeas corpus.").

18 As outlined previously in this case at Dkt. 19, Respondents reliance on *Pinson v.*
19 *Carjaval*, 69 F. 4th 1059, 1069 (9th Cir. 2023), is misplaced. The facts in *Pinson* differ
20 substantially and Petitioner in this case is situated differently than Petitioner's in *Pinson*, who
21 had access to other civil remedies under which to seek relief for their medical claims. *Id.* at 1075.

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1 Here, Mr. Sorio is in custody of federal agents and challenges his civil detention based on Fifth
2 Amendment grounds, unlike the Petitioners in *Pinson* who brought Eighth Amendment
3 challenges to criminal incarceration. If Mr. Sorio is precluded from bringing a habeas action to
4 challenge the unconstitutional medical conditions clearly present during his confinement, he is
5 left without a judicial setting to voice these claims, and the Court should extend jurisdiction to
6 his Fifth Amendment challenges under 28 U.S.C. § 2241.

7 **II. Petitioner's due process rights are being violated by the lack of medical care at**
8 **the Northwest ICE Processing Center.**

9 Mr. Sorio challenges his confinement on both substantive and procedural due process
10 grounds. Mr. Sorio argues that his substantive due process rights were violated due to the length
11 of confinement and severe medical neglect that resulted in substantial bodily harm. Mr. Sorio
12 asks this court to utilize two separate tests to help analyze his unconstitutional confinement
13 claims.

14 **A. Mr. Sorio's Confinement is Presumptively Punitive**

15 First in *King v. Cnty. Of L.A.*, 885 F.3d 548, 557 (9th Cir. 2018), the Court held that when
16 a detainee "detainee "is confined in conditions identical to, similar to, or more restrictive than,
17 those in which ... criminal counterparts are held," courts "presume that the detainee is being
18 subjected to 'punishment.'" *Jones v. Blanas*, 393 F.3d 918, 923 (9th Cir. 2009). If conditions of
19 civil confinement are equivalent to or more restrictive than criminal detention or civil post-
20 commitment detention, they are presumptively punitive and the burden shifts to the government
21 "to show (1) legitimate, non-punitive interests justifying the conditions of the detainee's
22 confinement and (2) that the restrictions imposed are not excessive in relation to these interests."

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1 Mr. Sorio argues that the court should find that detention at the NWIPC is at least
2 identical or similar to prison. *See* Ex. M, Ex. N. Therefore, the burden shifts to the Government.
3 If the Government cannot rebut this presumption, Mr. Sorio's unconstitutional punishment claim
4 prevails. Here, Mr. Sorio has provided sufficient evidence that the conditions of NWIPC are at
5 least equivalent to prison. Mr. Maliwat's declaration provides this court with a firsthand account
6 of the conditions inside NWIPC and how it compares to Federal prison. Decl. of Nehral Maliwat.
7 Mr. Maliwat was sentenced to Federal Military prison at the Naval Consolidated Brig in
8 Charleston, South Carolina for approximately 15 months. *Id.* at paragraph 2. Mr. Maliwat states
9 that his time in NWIPC was "significantly worse" than what he had experienced in prison. *Id.* at
10 paragraph 3. Additionally, Mr. Sorio cites to the news articles outlining the abhorrent conditions
11 of NWIPC, see Dkt. 20. Ex. 3, as evidence that NWIPC is at least equivalent to prison and
12 therefore the burden must shift to the government.

13 The government argues that it has a general, non-punitive governmental purpose in
14 detaining immigrants in order to effectuate immigration laws and ensure presence for removal.
15 This explanation does not explain why conditions of immigration detention must be similar to or
16 worse than prison. Additionally, the government does not explain how the conditions inside
17 NWIPC are not excessive in relation to its general purpose of "enforcement of the immigration
18 laws and fulfills a legitimate purpose of ensuring that individuals appear for their removal
19 proceedings." Dkt. 22. p. 16. Thus, the government has failed to rebut the presumption of
20 punitive confinement outlined in *King*.

21 B. Mr. Sorio's Confinement Is Unconstitutional Under *Castro*.

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1 If this Court finds the Government has successfully rebutted this presumption, the Court
2 should then utilize the four-factor test in *Castro v. County of Los Angeles*, 833 F. 3d 1070, 1085
3 (9th Cir. 2016). In *Castro*, the court utilizes a four-factor analysis which places the burden onto
4 the petitioner:

5 To demonstrate a due process violation on a conditions-of-confinement claim, a
6 petitioner must show: (1) the defendant made an intentional decision with respect
7 to the conditions under which the plaintiff was confined; (2) those conditions put
8 the plaintiff at substantial risk of suffering serious harm; (3) the defendant did not
9 take reasonable available measures to abate that risk, even though a reasonable
10 officer in the circumstances would have appreciated the high degree of risk
11 involved – making the consequences of the defendant’s conduct obvious; and (4)
12 by not taking such measure, the defendant caused the plaintiff’s injuries.

13 833 F.3d at 1071.

14 Here, Mr. Sorio incorporates by reference his arguments outlined in his reply to the
15 Respondent’s response for a Temporary Restraining Order. *See generally* Dkt. 19. Mr. Sorio
16 contends that under the standard outlined in *Castro*, the evidence weighs in his favor and that the
17 conditions of confinement violate his substantive due process rights. Mr. Sorio adds further
18 argument in response to the Respondent’s reply.

19 Mr. Sorio agrees that, in general, detention is “a constitutionally permissible aspect of the
20 Government’s enforcement of the immigration laws and fulfills a legitimate purpose of ensuring
21 that individuals appear for their removal proceedings.” Dkt. 22. p.16. However, Mr. Sorio does
22 not seek to challenge the Government’s ability to detain non-citizens. Mr. Sorio specifically
23 challenges the Government’s ability to subject non-citizens in civil detention to punitive
conditions of confinement without due process and without a legitimate purpose. The case law is
quite clear that there is no legitimate government purpose for unreasonable action, such as

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1 medical neglect. *Castro*, 833 F.3d at 1085 (IKUTA, J., dissenting) (“objectively unreasonable
2 action has no legitimate nonpunitive governmental purpose”); *Farmer v. Brennan*, 511 U.S. 825,
3 833 (1994) (“gratuitously” allowing violence among prisoners “serves no legitimate penological
4 objective”); *Whitley v. Albers*, 475 U.S. 312, 320 (1986) (the government’s “responsibility to
5 attend to the medical needs of prisoners does not ordinarily clash with other equally important
6 governmental responsibilities”); *Estelle v. Gamble*, 429 U.S. 97, 103 (1976) (the denial of
7 medical care which results in pain and suffering does not “serve any penological purpose”).

8 The Respondents incorrectly ask this court to utilize a “deliberate indifference” standard
9 to Mr. Sorio’s claims. This is despite the fact that he is not alleging an Eighth Amendment
10 violation and is a civil detainee. See Dkt. no 22. p. 20 (“Neither general allegations of negligence
11 nor a petitioner’s general disagreement with treatment received is enough to show deliberate
12 indifference.”). The Court should not utilize a deliberate indifference standard because Mr. Sorio
13 is not a prisoner and is not alleging an Eighth Amendment claim. Mr. Sorio’s claim is
14 substantially different than the plaintiffs in *Estelle* and *Youngberg*. Both *Estelle* and *Youngberg*
15 deal with 1983 civil rights actions and allege Eighth Amendment violations. These cases sought
16 injunctive relief or monetary damages. *Estelle*, 429 U.S. at 97; *Youngberg*, 457 U.S. at 321-22.

17 First, in *Estelle*, the Court specifically held that deliberate indifference is the proper
18 standard for Eighth Amendment claims. 429 U.S. at 104 (“We therefore conclude that deliberate
19 indifference to serious medical needs of prisoners constitutes the “unnecessary and wanton
20 infliction of pain,” *Gregg v. Georgia*, supra, at 173, 96 S.Ct. at 2925 (joint opinion), *proscribed*
21 *by the Eighth Amendment.*” [emphasis added]). *Estelle* did not go so far as requiring deliberate

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1 indifference for habeas petitions when the claim relates to due process claims of medical
2 neglect.

3 Additionally, Respondents inaccurately argue that the deliberate indifference standard
4 can be met “only when the decision by the [medical] professional is such a substantial departure
5 from accepted professional judgement, practice, or standards as to demonstrate that the person
6 responsible actually did not base the decision on such judgement.” Dkt. 22 p. 13; *Youngberg v.*
7 *Romeo*, 457 U.S. 307, 321-22 (1982). This standard in *Youngberg* went to liability for damages
8 and does not apply to Mr. Sorio’s habeas petition. *Id.* at 322-23 (“For these reasons, the decision,
9 if made by a professional, is presumptively valid; liability may be imposed only when the
10 decision by the professional is such a substantial departure from accepted professional judgment,
11 practice, or standards as to demonstrate that the person responsible actually did not base the
12 decision on such a judgment.”)¹

13 The correct analysis is outlined in *King v. Cnty. Of L.A.*, 885 F.3d 548, 557 (9th Cir. 2018)
14 and *Castro v. County of Los Angeles*, 833 F. 3d 1070, 1085 (9th Cir. 2016). Mr. Sorio’s claims
15 satisfy the four-factor analysis in *Castro*. Accordingly, Mr. Sorio respectfully asks this court to
16 grant his petition for writ of habeas corpus.

17 **III. Immediate release is warranted.**

18
19 ¹ In *Youngberg*, the court noted that the district court erroneously utilized the deliberate
20 indifference standard. *Youngberg v. Romeo*, 457 U.S. 307, 312 (1982) (“The “deliberate
21 indifference” standard was adopted by this Court in *Estelle v. Gamble*, 429 U.S. at 104, a case
22 dealing with prisoners’ rights to punishment that is not “cruel and unusual” under the Eighth
23 Amendment. Although the District Court did not refer to *Estelle v. Gamble* in charging the jury,
it erroneously used the deliberate-indifference standard articulated in that case. See App. 45a,
75a.”). *Youngberg*, 457 U.S. at 312 n.11.

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1
2 Petitioner requests immediate release until he is deemed medically fit for travel to the
3 Philippines. Respondents claim that Mr. Sorio can safely travel because “IHSC has cleared him,”
4 but IHSC is the very entity which has been denying Mr. Sorio reasonable and necessary medical
5 care for months. Notably, Respondents have not provided any medical records showing that Mr.
6 Sorio has been deemed fit for travel, or any medical records at all to support their assertion that
7 he has been provided with constitutionally adequate care. Additionally, Respondents claim that
8 ICE sought and obtained travel clearance documents but has provided no evidence of that
9 documentation. When ICE attempted to remove Mr. Sorio on December 7, 2025, he was refused
10 boarding by the airline due to his medical condition. At the time, ICE could not produce any
11 documentation clearing him to travel the over twenty hours to the Philippines. Independent
12 review of Mr. Sorio’s medical records and in-person appointments have revealed that travel is
13 likely dangerous given his current health, and immediate release is the only remedy to his current
14 and ongoing detention, which is already occurring in violation of Petitioner’s rights to due
15 process. Dkt. 20, ex. 1, 2. Mr. Sorio’s health has been severely compromised by his time at
16 NWIDC and any hope of improvement in that facility is low given the consistent neglect and
17 mistreatment he has experienced. If Mr. Sorio is to safely travel to the Philippines, in compliance
18 with his removal order, his health needs to be stabilized through immediate release.

19 **CONCLUSION**

20 For the reasons outlined above, Mr. Sorio respectfully requests that this Court grant his
21 petition for habeas corpus and order his immediate release.

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1 Respectfully submitted on December 23, 2025,

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13 **WORD COUNT CERTIFICATION**

14 I certify that this reply contains 3,844 words, in compliance with the Local Civil Rules.

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**TRAVERSE AND RESPONSE TO
RESPONDENTS' RETURN TO PETITION FOR
WRIT OF HABEAS CORPUS**

23

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