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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

CRISTINO HERNANDEZ-TRINIDAD
Petitioner,

v.

KRISTI NOEM, *et al.*

Respondents.

Case No. Case No. 2:25-cv-02610-TMC

**PETITIONERS' TRAVERSE AND
REPLY IN SUPPORT OF PETITION
FOR WRIT OF HABEAS CORPUS**

**Noted for Consideration: January 7,
2026**

1
2 Respondents offer no meaningful response to Petitioners’ petition for a writ of habeas corpus.
3 Federal Respondents acknowledge that in *Rodriguez Vazquez v. Bostock*, this Court granted
4 summary judgment and found that detention pursuant to 8 U.S.C. § 1225(b)(2) of the Bond
5 Denial Class is unlawful. *Rodriguez Vazquez v. Bostock*, No. 3:25-cv-05240-TMC, 2025 WL
6 2782499 (W.D. Wash. Sept. 30, 2025). Additionally, they acknowledge, in *Maldonado Bautista*
7 *v. Santacruz*, the district court found the same and extended declaratory relief to a similarly
8 defined and certified nationwide Bond Eligible Class. And as the Respondents acknowledge, the
9 Petitioner is a member of *both* the class certified in *Rodriguez Vasquez* by virtue of being
10 detained in the Northwest Detention Center and also of *Maldonado Bautista* for being: a
11 noncitizen in the United States without lawful status who (1) have entered or will enter the
12 United States without inspection; (2) were not or will not be apprehended upon arrival; and (3)
13 are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at
14 the time the Department of Homeland Security makes an initial custody determination.”

15 *Rodriguez*, 2025 WL 2782499, at *6, *Maldonado Bautista*, 2025 WL 3288403, at *1.

16 In either class, he is eligible for a bond hearing pursuant to 8 U.S.C. §1226(a).

17 Thus, the Court should accordingly grant the habeas petition “forthwith.” 28 U.S.C. § 2241.

18 DATED this 4th of January 2026.

19 /s/ Courtney A. Carter
20 Courtney A. Carter

21 *Attorney for Petitioner*

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