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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Francis TSYAMBA and Luis Enrique
ARREOLA SERENO,

Petitioners,

v.

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

Respondents.

Case No. 2:25-cv-2623

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

1 **INTRODUCTION**

2 1. This case challenges Respondents' unlawful re-detention of Petitioners Francis
3 Tsyamba and Luis Enrique Arreola Sereno. Both Petitioners are currently in the physical custody
4 of Respondents at the Northwest ICE Processing Center (NWIPC).

5 2. Each Petitioner was apprehended shortly after entering the United States and
6 thereafter released from immigration custody for the purpose of pursuing relief in removal
7 proceedings. Since their release, each Petitioner has fulfilled their conditions of release, attended
8 removal proceedings, submitted applications for relief, received employment authorization, and
9 built a life in the United States. None have criminal records in the United States or any other
10 country.

11 3. Despite Petitioners' compliance while released, including attending their court
12 hearings in their removal proceedings, each was abruptly and unlawfully re-detained by the
13 Department of Homeland Security (DHS).

14 4. Prior to re-detaining each of the Petitioners, Respondents did not provide any
15 written notice explaining the basis for the revocation of their releases. Likewise, Respondents did
16 not assess whether Petitioners presented a flight risk or danger to the community prior to their re-
17 arrests. Nor did Respondents provide a hearing before a neutral decisionmaker, where
18 Immigration and Customs Enforcement (ICE) was required to justify the basis for re-detention or
19 to explain why each Petitioner is now a flight risk or danger to the community.

20 5. As this Court has recently held in multiple cases, due process demands a hearing
21 prior to the government's decision to terminate a person's liberty. *See, e.g., E.A. T.-B. v.*
22 *Wamsley*, 795 F. Supp. 3d 1316, 1321–24 (W.D. Wash. 2025); *Ramirez Tesara v. Wamsley*, ---
23 F. Supp. 3d ---, 2025 WL 2637663, at *2–4 (W.D. Wash. Sept. 12, 2025); *Ledesma Gonzalez v.*

1 *Bostock*, No. 2:25-CV-01404-JNW-GJL, 2025 WL 2841574, at *7–9 (W.D. Wash. Oct. 7,
2 2025); *Kumar v. Wamsley*, No. 2:25-CV-01772-JHC-BAT, 2025 WL 2677089, at *2–4 (W.D.
3 Wash. Sept. 17, 2025); Report & Recommendation, *Lopez Reyes v. Wamsley*, No. 2:25-cv-
4 01868-JLR-MLP (W.D. Wash. Oct. 15, 2025), Dkt. 13; *Y.M.M. v. Wamsley*, No. 2:25-CV-
5 02075-TMC, 2025 WL 3101782, at *2 (W.D. Wash. Nov. 6, 2025); *P.T. v. Hermosillo*, No. C25-
6 2249-KKE, 2025 WL 3294988, at *4 (W.D. Wash. Nov. 26, 2025); Order, *Francois v. Wamsley*,
7 No. 2:25-cv-02122-RSM-GJL (W.D. Wash. Dec. 5, 2025), Dkt. 22 at 8. Many other courts have
8 recently held the same.

9 6. By failing to provide such a hearing, Respondents have violated Petitioners’
10 constitutional rights to due process.

11 7. Accordingly, this Court should grant the instant petition for a writ of habeas
12 corpus and order Petitioners’ immediate release. *See E.A. T.-B.*, 795 F. Supp. 3d at 1324
13 (ordering immediate release because “a post-deprivation hearing cannot serve as an adequate
14 procedural safeguard because it is after the fact and cannot prevent an erroneous deprivation of
15 liberty”); *Ramirez Tesara*, 2025 WL 2637663, at *4 (similar); *Kumar*, 2025 WL 2677089, at *3–
16 4 (similar); *Ledesma Gonzalez*, 2025 WL 2841574, at *9 (similar); *Y.M.M.*, 2025 WL 3101782,
17 at *2–3 (similar); *P.T.*, 2025 WL 3294988, at *4 (similar).

18 JURISDICTION

19 8. This action arises under the Constitution of the United States and the Immigration
20 and Nationality Act (INA), 8 U.S.C. § 1101 et seq.

21 9. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas
22 corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States
23 Constitution (Suspension Clause).

1 10. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241
2 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C.
3 § 1651.

4 **VENUE**

5 11. Venue is proper because all ten Petitioners are in Respondents' custody at the
6 NWIPC in Tacoma, Washington. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*,
7 410 U.S. 484, 493–500 (1973), venue lies in the judicial district in which Petitioners are
8 currently in custody.

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

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

14 13. The Court must grant the petition for writ of habeas corpus or issue an order to
15 show cause to the Respondents “forthwith,” unless Petitioners are not entitled to relief. 28 U.S.C.
16 § 2243.

17 14. Habeas corpus is “perhaps the most important writ known to the constitutional
18 law . . . affording as it does a swift and imperative remedy in all cases of illegal restraint or
19 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963). “The application for the writ usurps the
20 attention and displaces the calendar of the judge or justice who entertains it and receives prompt
21 action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120
22 (9th Cir. 2000) (citation omitted); *see also Van Buskirk v. Wilkinson*, 216 F.2d 735, 737–38 (9th
23

1 Cir. 1954) (habeas corpus is “a speedy remedy, entitled by statute to special, preferential
2 consideration to insure expeditious hearing and determination”).

3 **PARTIES**

4 15. Petitioner Francis Tsyamba is a citizen of Kenya. He is detained at the NWIPC.

5 16. Petitioner Luis Enrique Arreola Sereno is a citizen of Mexico. He is detained at
6 the NWIPC.

7 17. Respondent Laura Hermosillo is the Acting Seattle Field Office Director for ICE
8 Enforcement and Removal Operations (ERO). The Seattle Field Office is responsible for local
9 custody decisions relating to noncitizens charged with being removable from the United States.

10 The Seattle Field Office’s area of responsibility includes Alaska, Oregon, and Washington.

11 Respondent Hermosillo is a legal custodian of Petitioners and is sued in her official capacity.

12 18. Respondent Bruce Scott is employed by the private corporation The GEO Group,
13 Inc., as Warden of the NWIPC, where Petitioners are detained. He has immediate physical
14 custody of Petitioners. He is sued in his official capacity.

15 19. Respondent Kristi Noem is the Secretary of the Department of Homeland Security
16 (DHS). She is responsible for the implementation and enforcement of the Immigration and
17 Nationality Act (INA), and oversees ICE, which is responsible for Petitioners’ detention. Ms.

18 Noem has ultimate custodial authority over Petitioners and is sued in her official capacity.

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

22 21. Respondent Pamela Bondi is the Attorney General of the United States, and as
23 such has authority over the Department of Justice. She is sued in her official capacity.

1 **FACTUAL BACKGROUND**

2 **Petitioner Francis Tsyamba**

3 22. Petitioner Francis Tsyamba is a citizen of Kenya who fled threats and torture
4 based on account of his membership in the LGBTQ community. Tsyamba Decl. ¶ 1.

5 23. On April 24, 2024, Mr. Tsyamba entered the United States at Boston Logan
6 International Airport. Tsyamba Decl. ¶ 2. He entered on a B1/B2 visa, but it was cancelled by
7 CBP upon his entry. Tsyamba Decl. ¶ 2; Ex. A.¹ He was detained, and on May 24, 2024, ICE
8 gave him an Interim Notice Authorizing Parole. *See* Tsyamba Decl. ¶ 2; Ex. B.

9 24. Mr. Tsyamba moved to Spokane, Washington, where he fully complied with the
10 requirements of his immigration process. *See* Tsyamba Decl. ¶ 3. He notified DHS of his updated
11 address, presented for check-ins, and complied with the requirements of his release. *Id.* ¶ 4–5;
12 *see also* Ex. C. Every Wednesday he sent a photo of himself via the BI SmartLINK app.
13 Tsyamba Decl. ¶ 4.

14 25. Mr. Tsyamba timely filed his asylum application on October 14, 2024. *Id.* ¶ 5.

15 26. On June 11, 2025, Mr. Tsyamba reported to his scheduled check-in at the ICE
16 ERO Spokane office. *Id.* ¶ 6. He completed his check-in and was told to check back in a month.
17 *Id.* On his way home, he received a call from ICE asking him to return to the office. *Id.* He
18 complied with their request and returned to the office. *Id.* Notwithstanding his full compliance
19 with the conditions of his release, ICE detained and transported him to the NWIPC. *Id.*

20 27. On September 11, 2025, the immigration judge (IJ) granted Mr. Tsyamba's
21 asylum application based on his well-founded fear of persecution in Kenya. Tsyamba Decl. ¶ 6.

22 _____
23 ¹ All exhibit citations are to the authenticating declaration of Karla Partida Castro filed contemporaneously with this petition.

1 The next day, however, he learned that he would remain in ICE custody because DHS had
2 appealed the judge's decision. *Id.*

3 28. Since being re-detained in June 2025, Mr. Tsyamba's anxiety, depression, and
4 post-traumatic stress disorder symptoms have worsened. *Id.* ¶ 9. He suffers from frequent panic
5 attacks. *Id.* Mr. Tsyamba has also been denied care for his keratoconus, and his vision is
6 worsening. *Id.*

7 29. Mr. Tsyamba plans to continue working with his attorney to defend against the
8 government's appeal of his asylum grant. *Id.* ¶ 8. He will also continue to comply with any
9 requirements of his release, as he has done since his arrival in the United States. *Id.*

10 30. Prior to being detained by ICE, Mr. Tsyamba had built a life in Spokane,
11 Washington. *Id.* ¶ 11. Since receiving his employment authorization card, he has worked as a
12 caregiver. *Id.* Mr. Tsyamba yearns to return to his supportive network of friends and community
13 members in Spokane to continue building his life and seek protection in the United States. *Id.*

14 31. Mr. Tsyamba has no criminal history anywhere in the world. *Id.* ¶ 10.

15 32. Prior to Mr. Tsyamba's re-arrest on June 11, 2025, he did not receive written
16 notice of the reason for his re-detention.

17 33. Prior to Mr. Tsyamba's re-arrest, ICE did not assess whether he presented a flight
18 risk or danger to the community.

19 34. Prior to Mr. Tsyamba's re-arrest, he was not afforded a hearing before a neutral
20 decisionmaker to determine whether his re-detention was justified.

21 **Petitioner Luis Enrique Arreola Sereno**

22 35. Petitioner Luis Enrique Arreola Sereno is a citizen of Mexico and was forced to
23 leave due to [REDACTED] Arreola Sereno Decl. ¶ 1.

1 36. Mr. Arreola Sereno entered the United States in October 2023 near San Ysidro,
2 California and was apprehended by border patrol. *Id.* ¶ 2. He was given parole and issued a
3 Notice to Appear placing him in removal proceedings, with a preliminary hearing scheduled in
4 2027. *Id.* ICE told Mr. Arreola Sereno that once he reached his destination, he needed to
5 complete a biometrics appointment and inform them that he had reached his destination. *Id.*

6 37. Mr. Arreola Sereno moved to Yakima, Washington, where he lived with his aunt,
7 uncle, and cousins. *Id.* ¶ 3. Mr. Arreola Sereno timely filed his asylum application and received
8 his employment authorization card. *Id.* ¶ 6.

9 38. He complied with the requirements of his release, as instructed. *Id.* ¶ 3. When he
10 arrived in Yakima, Washington, he presented himself at the ICE ERO office in Yakima to
11 register his biometrics and enrolled in the Intensive Supervision Appearance Program (ISAP), an
12 Alternatives to Detention program. *Id.*

13 39. As part of ISAP, Mr. Arreola Sereno was required to both attend in-person
14 appointments and complete certain requirements via the SmartLink application on his cell phone,
15 such as video calls with his location turned on and weekly check-in photos. *Id.* ¶ 4. At first, he
16 was required to attend monthly check-in appointments, but later, was permitted to check in every
17 three months. *Id.* He attended all of his video and in-person appointments, and sent a picture of
18 himself every Thursday as required. *Id.* The SmartLink app required him to submit a picture of
19 himself within thirty minutes of receiving a notification, and to his knowledge, he always sent
20 his photos when he got a notification from SmartLink. *Id.*

21 40. On occasion, he experienced technical issues using SmartLink. *Id.* ¶ 5.
22 Sometimes, it would mark a photo as late even though he took it on time, or would simply not
23 give him the option to take a photo even when he was within the allotted thirty-minute window.

1 *Id.* Mr. Arreola Sereno discussed these technical issues with the ISAP and ICE officers during
2 his in-person check-ins, and they told him on multiple occasions there was no problem and to
3 keep submitting his photos within the required time. *Id.* ¶ 7. Mr. Arreola Sereno does not recall
4 receiving any warning from ICE or ISAP that he was out of compliance with the conditions of
5 his release. *Id.*.

6 41. On November 13, 2025, Mr. Arreola Sereno was pulled over by ICE agents while
7 driving home. *Id.* The ICE agents told him that they had an arrest warrant, although they never
8 showed it to him. *Id.* The ICE agents asked him to get out of the car and asked questions about
9 his immigration status. *Id.* He complied with the ICE agents' requests and answered all their
10 questions. *Id.* The ICE agents detained him and transported him to the NWIPC. *Id.* ¶ 9.

11 42. Mr. Arreola Sereno has no criminal history anywhere in the world. *Id.* ¶ 8. He
12 has never been detained or imprisoned, and being in detention has been very difficult for him. *Id.*
13 ¶ 9.

14 43. DHS recently filed a motion to prepermit Mr. Arreola Sereno's case based on an
15 Asylum Cooperative Agreement. *Id.* However, he plans to oppose this motion and continue
16 pursuing his asylum claim here in the United States. *Id.*

17 44. Prior to Mr. Arreola Sereno's re-arrest on November 13, 2025, he did not receive
18 written notice of the reason for his re-detention.

19 45. Prior to Mr. Arreola Sereno's re-arrest, ICE did not assess whether he presented a
20 flight risk or danger to the community.

21 46. Prior to Mr. Arreola Sereno's re-arrest, he was not afforded a hearing before a
22 neutral decisionmaker to determine whether his re-detention was justified.
23

1 **LEGAL FRAMEWORK**

2 **Due Process Principles**

3 47. Due process requires that if DHS seeks to re-arrest a person like Mr. Tsyamba and
4 Mr. Arreola Sereno—individuals who were released and given upcoming court dates, have lived
5 in the United States without incident after their initial release, and have otherwise complied with
6 the terms of their release—the government must afford a hearing before a neutral decisionmaker
7 to determine whether any re-detention is justified because the person is a flight risk or danger to
8 the community.

9 48. “Freedom from imprisonment—from government custody, detention, or other
10 forms of physical restraint—lies at the heart of the liberty protected by the Due Process Clause.”
11 *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). As this Court recently recognized, this is “the most
12 elemental of liberty interests.” *E.A. T.-B.*, 795 F. Supp. 3d at 1321 (quoting *Hamdi v. Rumsfeld*,
13 542 U.S. 507, 529 (2004)); *see also Ramirez Tesara*, 2025 WL 2637663, at *3 (stating that the
14 petitioner had “an exceptionally strong interest in freedom from physical confinement”).

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

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

22 51. To protect against arbitrary re-detention and to ensure the right to liberty, due
23 process requires “adequate procedural protections” that test whether the government’s asserted

1 justification for a noncitizen’s physical confinement “outweighs the individual’s constitutionally
2 protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690 (citation modified).

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

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

14 54. For example, in *E.A. T.-B.*, this Court applied the *Mathews v. Eldridge*, 424 U.S.
15 319 (1976), framework to hold that even in a case where the government asserted that mandatory
16 detention initially applied, a person’s re-detention could not occur absent a hearing. The Court
17 did the same in *Ramirez Tesara, Kumar, and Ledesma Gonzalez*. *See Ramirez Tesara*, 2025 WL
18 2637663, at *2–3; *Kumar*, 2025 WL 2677089, at *2–3; *Ledesma Gonzalez*, 2025 WL 2841574,
19 at *7–8.

20 55. In applying the three *Mathews* factors, the *E.A. T.-B.* court held that the petitioner
21 had “undoubtedly [been] deprive[d] . . . of an established interest in his liberty,” which, as
22 noted, “is the most elemental of liberty interests[.]” 795 F. Supp. 3d at 1321 (citation modified).
23 The Court further explained that even if detention was mandatory, the risk of erroneous

1 deprivation of liberty without a hearing was high because a hearing serves to ensure that the
2 purposes of detention—the prevention of danger and flight risk—are properly served. *Id.* at
3 1322–23. Finally, the Court explained that:

4 [T]he Government’s interest in re-detaining non-citizens previously released
5 without a hearing is low: although it would have required the expenditure of finite
6 resources (money and time) to provide Petitioner notice and hearing on [ISAP]
7 violations before arresting and re-detaining him, those costs are far outweighed by
8 the risk of erroneous deprivation of the liberty interest at issue.

9 *Id.* at 1324. As a result, this Court ordered the petitioner’s immediate release. *Id.*

10 56. This Court applied a similar analysis in *Ramirez Tesara*. There, the Court
11 reasoned that the petitioner had a “weighty” interest in his liberty and was entitled to the “full
12 protections of the due process clause.” 2025 WL 2637663, at *3. When examining the value of
13 additional safeguards, the Court also noted that despite the government’s allegations of ISAP
14 violations, “the fact ‘that the Government may believe it has a valid reason to detain Petitioner
15 does not eliminate its obligation to effectuate the detention in a manner that comports with due
16 process.’” *Id.* at *4 (quoting *E.A. T.-B.*, 795 F. Supp. 3d at 1322). Finally, the Court reasoned that
17 any government interest in re-detention without a hearing was “minimal.” *Id.* Accordingly, there
18 too, the Court ordered the petitioner’s immediate release. *Id.* at *5.

19 57. The *Kumar* and *Ledesma Gonzalez* courts reached the same decision, again
20 holding that all three factors weighed in favor of affording the petitioner a bond hearing. 2025
21 WL 2677089, at *3–4; 2025 WL 2841574, at *7–9; *see also* Report & Recommendation, *Lopez*
22 *Reyes*, No. 2:25-cv-01868-JLR-MLP (W.D. Wash. Oct. 15, 2025), Dkt. 13 (same).

23 58. This Court’s decisions in *E.A. T.-B.*, *Ramirez Tesara*, *Kumar*, and *Ledesma*
Gonzalez are consistent with many other district court decisions addressing similar situations.
See, e.g., Valdez v. Joyce, --- F. Supp. 3d ---, 2025 WL 1707737 (S.D.N.Y. June 18, 2025)

1 (ordering immediate release due to lack of pre-deprivation hearing); *Garro Pinchi v. Noem*, 792
2 F.Supp.3d 1025 (N.D. Cal. July 24, 2025) (similar); *Maklad v. Murray*, No. 1:25-CV-00946 JLT
3 SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-
4 01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug. 21, 2025) (similar).

5 59. The same framework and principles apply here and compel the immediate release
6 of all Petitioners.

7 CLAIM FOR RELIEF

8 Violation of Fifth Amendment Right to Due Process 9 Procedural Due Process

10 60. Petitioners restate and reallege all the prior paragraphs as if fully set forth herein.

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

16 62. Respondents revoked Petitioners' releases and deprived them of liberty without
17 providing written notice and a meaningful opportunity to be heard by a neutral decisionmaker
18 prior to their re-detention.

19 63. Accordingly, Petitioners' re-detention violates the Due Process Clause of the Fifth
20 Amendment.

21 PRAYER FOR RELIEF

22 WHEREFORE, Petitioners respectfully request that this Court:

23 (1) Assume jurisdiction over this matter;

- 1 (2) Require Respondents to show cause within fourteen days of this Petition's filing as to
2 why this Petition should not be granted as required by 28 U.S.C. § 2243, and
3 permitting Petitioners to file a traverse within five days of Respondents' return, *see*
4 W.D. Wash. Gen. Order No. 10-25 & App. A;
- 5 (3) Issue an Order that prohibits Respondents from transferring Petitioners out of this
6 district during the pendency of the court's adjudication of this petition, or,
7 alternatively, orders Respondents to notify Petitioners and their habeas counsel in
8 advance of any transfer or removal, *see* W.D. Wash. Gen. Order No. 10-25 & App. A;
- 9 (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioners from
10 custody immediately and permanently enjoining their re-detention during the
11 pendency of their removal proceeding absent written notice and a hearing prior to re-
12 detention where Respondents must prove by clear and convincing evidence that each
13 Petitioner is a flight risk or danger to the community and that no alternatives to
14 detention would mitigate those risks;
- 15 (5) Order that upon Petitioners' release, Respondents must return to Petitioners any
16 personal property, including personal identification documents (other than a passport)
17 and employment authorization documents;
- 18 (6) Declare that the re-detention of Petitioners while removal proceedings are ongoing
19 without first providing an individualized determination before a neutral
20 decisionmaker violates the Due Process Clause of the Fifth Amendment;
- 21 (7) Award Petitioners attorney's fees and costs under the Equal Access to Justice Act,
22 and on any other basis justified under law; and
- 23 (8) Grant any further relief this Court deems just and proper.

1 Respectfully submitted this 19th day of December, 2025.

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