

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

JOSE RAMON CASTELLANO PENALOZA,
Petitioner,
v.
ICE FIELD OFFICE DIRECTOR, *et al.*,
Respondent

CASE NO. 2:25-cv-02629-DGE
SUPPLEMENTAL DECLARATION
OF ADRIAN LEYBA

I, Adrian Leyba, 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer employed by the United States Department of Homeland Security ("DHS"), United States Immigration and Customs Enforcement ("ICE"), Office of Enforcement and Removal Operations ("ERO"). I am currently assigned to the ERO office at the Northwest ICE Processing Center ("NWIPC") in Tacoma, Washington.
2. I am familiar with the case of JOSE RAMON CASTELLANO PENALOZA ("Petitioner"). I make this declaration based upon my personal and professional knowledge, obtained from various records and systems maintained by ICE in the regular course of business. I provide this declaration based on the best of my knowledge, information, belief, and reasonable inquiry in the above-captioned case.
3. Petitioner was scheduled to be removed to Mexico on January 20, 2026, pursuant to the third county removal notice which had been served.

1 4. On or about January 17, 2026, ERO Tacoma was made aware that flights to Venezuela were
2 resuming. ERO did not then remove Petitioner on January 20, 2026.

3 5. Based on the resumed flights to Venezuela, ERO Tacoma extended Petitioner's time period
4 to voluntarily depart the U.S. pursuant to the immigration judge's order.

5 6. ERO Tacoma intends to transfer Petitioner on January 31, 2026, to Arizona for a flight to
6 Venezuela on February 2, 2026.

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8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed at Tacoma, Washington, dated January 22, 2026.

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12 Adrian Leyba
13 Deportation Officer
14 United States Department of Homeland Security
United States Immigration and Customs Enforcement
Tacoma, Washington