

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HUMBERTO JIMENEZ-PEREZ,

Plaintiff,

v.

PAMELA BONDI, Attorney General of the
United States; KRISTI NOEM, Secretary,
United States Department of Homeland
Security; TODD LYONS, Acting Director for
the U.S. Immigration and Customs
Enforcement; LAURA HERMOSILLO, Acting
Seattle Field Office Director, U.S. Immigrations
and Customs Enforcement; BRUCE SCOTT,
Warden of Immigration Detention Facility; and
the UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Respondent(s).

No. 2:25-cv-02631-JLR

NOTICE OF SUPPLEMENTAL
AUTHORITY

TO THE COURT AND COUNSEL OF RECORD:

Please take notice of the attached supplemental authority, concurrently filed as **Exhibit 1**.

The Honorable Judge Tana Lin found on February 13, 2026, that the unconstitutionality and potential punitive nature of civil detention is a question that “clearly sounds in habeas because it goes directly to the legality of the detention itself.” *Sorio v. Hermosillo*, 2:25-cv-02492-TL, 2026 U.S. Dist. LEXIS 30627 at *19-20 (W.D. Wash. Feb. 13, 2026) (citing *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S. Ct. 2491, 150 L. Ed. 2d 653 (2001)). Judge Lin ultimately found that Petitioner’s unreasonable medical treatment violated his constitutional rights and warranted his immediate release:

NOTICE OF SUPPLEMENTAL AUTHORITY - 1

No. 2:25-cv-02631-JLR

MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

1 Under the unique facts of this case, the extreme consequences of
2 Respondents' unreasonable treatment of Petitioner constitute
3 deprivations so excessive that the conditions of detention alone take
4 Respondents' detention of Petitioner out of the realm of
5 constitutional civil detention and render it punitive. Because he is
6 subject to punitive detention for which he has had no due process of
7 law, the Court finds that Petitioner is in custody in violation of the
8 Constitution of the United States and his immediate release is
9 required.

10 *Id.* at *32-33.

11 DATED this 17th day of February, 2026. Respectfully submitted,

12 MacDONALD HOAGUE & BAYLESS

13 By: /s/ Lauren I. Freidenberg-McBride
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20 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I, Andrew Drake, declare under penalty of perjury under the laws of the United States of America that I caused to be served in the manner noted below a copy of the document entitled Notice of Supplemental Authority on the following participant(s):

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Attorneys for Federal Respondents

- ☐ via facsimile
- ☐ via overnight mail
- ☐ via first-class U.S. mail
- ☐ via hand delivery
- ☒ via Court ECF system
- ☐ via email: *pursuant to the stipulation of electronic service*

DATED this 17th day of February, 2026, at Seattle, Washington.

/s/Andrew Drake
Andrew Drake, Legal Assistant