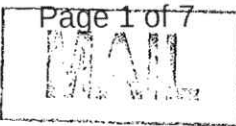


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JAN 22 2026

SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BY
NAME: Luis Alberto Saras Catano District Judge: DEPUTY
1623 EAST J Street Suite Five Thomas S. Zilly
TACOMA, WASHINGTON 98421

United States District Court
in And For the Western District of WASHINGTON

Name: Luis Alberto Saras
Petitioner
VS.

ICE Field Office Director
Respondent

Case NO: 2:25-cv-02630

Reply to Response to
Motion

The petitioner is currently held in custody of the Attorney general at Tacoma's Northwest Detention Center in Tacoma Washington.

Here, the Petitioner Moves this Court to

1. Be immediately released from detention under Zadvydas v. Davis, 533 U.S. 678, 689, 121 S. Ct. 2491, 150 L. Ed. 2d 653 (2001); [*702] v. 208 F. 3d At 831 and n. 30
2. Provide me with a hearing in which the government must show I'm a risk of flight or danger to the community before re-detaining me as required by the due Process clause.
3. Not to remove me to a third country in an unconstitutionally, Punitive manner and provide me with a notice and an opportunity to any third country removal attempt in a re-opened removal proceeding.

In respondents return memorandum it states that theres no records have been located demonstrating wheather OREC was removed at the time. Also immigration have Frozen all Venenzualon case do to conflicts. thus I beleive Im in tittled to releave under (Zaday. vs. Davis

Similar Cases

Martinez V. Hyde 792 F. Supp 3d 211

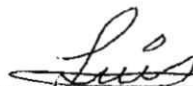
Sampia V. Hyde 2025 U.S. Distric Lexis 175513

VERIFICATION

I, Luis Alberto Saras, do hereby aver that the words above are the truth and the entire truth, that I will testify to those facts under penalty of perjury and I provide this information based upon personal belief that they are the facts of this matter, except where stated on personal belief. Submitted under the penalty of perjury of the laws of the United States.

//

Dated this 01/16/2026


SIGN _____

PROOF OF SERVICE

&

DECLARATION

I, Luis Alberto Saras, AVER THAT I AM A PARTY TO THIS ACTION DO
HEREBY AVER THAT I HAVE PROVIDED A COPY OF THE FOREGOING DOCUMENT:

REPLY TO RESPONSE TO MOTION

**U.S. District Court
Clerk's Office
700 Stewart Street, Suite 2310
Seattle, Washington 98101**

Charles Neek Floyd
700 Stewart Street, Suite 5220
Seattle WA. 98101-1271

I WILL TESTIFY UNDER THE PENALTY OF PERJURY THAT THIS IS THE TRUTH.

THE ITEMS WERE MAILED FIRST CLASS MAIL ON THE DATE BELOW.

SUBMITTED ON 01/16/2026

SIGN



EXHIBIT #1

Case 2:25-cv-02630-TSZ Document 7 Filed 01/14/26 Page 5 of 7

1 various requirements. Lambert Decl., Ex. D, OREC. On March 5, 2020, DHS issued a notice to
2 appear, charging him with removability pursuant to 8 U.S.C. § 1182(a)(6)(A)(i). Lambert Decl.,
3 Ex. B, Notice to Appear. In October 2020, an immigration judge sustained the charge and
4 designated Venezuela as the country of removal. Bloom Decl., ¶ 7.

5 In 2022, an immigration judge denied all applications for relief and ordered Petitioner
6 removed to Venezuela, with Colombia designated in the alternative. Bloom Decl., ¶ 9. Petitioner
7 has appealed this order and the appeal is currently pending before the Board of Immigration
8 Appeals ("BIA"). Bloom Decl., ¶ 10.

9 Multiple times in 2024 and 2025, ICE lodged an immigration detainer at jails where
10 Petitioner was being held for criminal charges. Bloom Decl., ¶¶ 11-14.

11 On October 3, 2025, ICE arrested Petitioner. Bloom Decl., ¶ 15; Lambert Decl., Ex. F,
12 Warrant for Arrest; Ex. G, Form I-213. ~~No records have been located demonstrating whether~~
13 ~~Petitioner's OREC was revoked at that time.~~ Petitioner was transferred to the Northwest ICE
14 Processing Center approximately a week later. Bloom Decl., ¶ 16. Because Petitioner's appeal is
15 still pending before the BIA, he is not subject to a final order of removal.

16 IV. CONCLUSION *Reou*

17 In further response to Dkt. 3, Respondent does not believe that an evidentiary hearing is
18 necessary.

19 DATED this 14th day of January, 2026.

20 Respectfully submitted,

21 CHARLES NEIL FLOYD
22 United States Attorney

23 s/ Michelle R. Lambert
24 MICHELLE R. LAMBERT, NYS#4666657
Assistant United States Attorney

EXHIBIT #2

Venezuelan immigrants face deportation fears

Following President Donald Trump's military strikes that led to the capture of Venezuelan President Nicolás Maduro, Venezuelan communities across the U.S. experienced mixed emotions of celebration and fear about potential deportation. Nearly 8 million Venezuelans now live outside their country, including 1.2 million in the U.S., many of whom fled economic collapse and political repression beginning in 2014. The Trump administration has stripped protections for Venezuelans, including Temporary Protected Status that covered more than 600,000 people, and officials are encouraging undocumented Venezuelans to return home. Immigration cases for Venezuelans remain frozen following an executive order, and experts warn the invasion could justify renewed use of the Alien Enemies Act for rapid deportations.

Reported by Los Angeles Times/TNS, published Jan. 11