

DETAINED

The Honorable Theresa L. Fricke

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Attorney for Petitioner

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KAE A. SAELEE,

Petitioner,

v.

PAMELA BONDI, *et al.*;

Respondents.

CASE NO.: 2:25-cv-02677-TLF

PETITIONER'S MOTION TO
RECONSIDER SUPPLEMENTAL
BRIEFING

NOTED FOR CONSIDERATION:
January 12, 2026

PETITIONER'S MOTION TO RECONSIDER SUPPLEMENTAL BRIEFING

On January 9, 2026, the Court directed the parties to submit supplemental briefing regarding Due Process, with the petitioner's brief due on January 15, 2026, and the government's due on January 22, 2026. Dkt. 10. The order effectively delays consideration of the habeas petition from today until 10 days from now.

PETITIONER'S MOTION TO
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1 Petitioner's traverse is due today, Dkt. 2, and it is being filed contemporaneously with
2 this motion. The traverse includes the petitioner's argument as to his Due Process claim,
3 including the topics the Court outlined in its Order Directing Supplemental Briefing. The
4 government has already had an opportunity to argue the Due Process issues in its Return, filed
5 January 6, 2026. Dkt. 6.

6 For these reasons, and to limit the time the petitioner must remain in detention until his
7 habeas petition is decided, the petitioner asks the Court to reconsider its order directing
8 supplemental briefing.

9
10 I certify that this memorandum contains 151 words, in compliance with the Local Civil Rules.

11 Dated this 12th day of January, 2026.

12 /s/ Kelly Vomacka

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