

NOT DETAINED

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**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON**

JUN REN,

Petitioner,

v.

PAMELA BONDI, Attorney General;
KRISTI NOEM, Secretary of Homeland
Security;
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement;
LAURA HERMOSILLO, Field Office
Director, ICE Seattle Field Office;
BRUCE SCOTT, Warden, Northwest ICE
Processing Center;

Respondents.

Case No.: 2:25-cv-02693-TL

PETITIONER'S RESPONSE TO
RESPONDENTS' SUBMISSIONS AND
NOTICE OF PETITIONER'S POSITION
REGARDING DISPOSITION

Agency File Number:



**PETITIONER'S RESPONSE TO RESPONDENTS' SUBMISSIONS AND NOTICE OF
PETITIONER'S POSITION REGARDING DISPOSITION**

Petitioner Jun Ren, through undersigned counsel, respectfully submits this response pursuant to the Court's Order inviting a response to Respondents' recent filings and directing Petitioner to state his position regarding the disposition of the pending habeas petition. *See* Dkt. No. 17.

This habeas petition was fully briefed and under submission when Petitioner appeared for his individual hearing on January 29, 2026. During that hearing, Petitioner withdrew his applications for relief and waived appeal.¹ Respondents subsequently removed Petitioner to China on February 6, 2026, without providing the required advance notice to habeas counsel. Although Respondents concede that notice should have been provided, their submissions leave several material questions unresolved.

First, the narrative concerning Petitioner's removal timeline appears inconsistent. Earlier filings indicated that Petitioner was informed on January 30, 2026 that he would be placed on a removal flight scheduled for February 6, 2026, whereas later declarations state that he was told only that removal would occur "within two weeks." *Compare* Dkt. No. 14 at 2 *with* Dkt. 20 at ¶ 5. The discrepancy raises questions regarding the accuracy of the timeline presented to the Court.

Second, Respondents' explanation of the communication breakdown lacks critical documentation. No declaration has been provided from the "assigned OPLA attorney" who was

¹ The hearing record reflects that this decision occurred in the context of prolonged detention and significant physical and psychological deterioration described by Petitioner to the immigration judge, including worsening eyesight, weight loss, insomnia, anxiety, and depression. *See* Dkt. No. 19, Exh. B.

1 allegedly responsible for notifying habeas counsel. *See* Dkt. No. 19 at ¶ 3. Nor have
2 Respondents produced the January 30, 2026 email that purportedly triggered the notification
3 process. Without testimony from the responsible individual or production of the referenced
4 communication itself, the Court lacks objective corroboration of the events described.

5 Third, Respondents do not explain why direct notice was not provided by ICE
6 Enforcement and Removal Operations (“ERO”), despite counsel’s Form G-28 on file, which
7 would have allowed direct communication without reliance on a multi-step internal chain. *See*
8 Dkt. No. 12-2. The absence of clarity regarding who bears ultimate responsibility for ensuring
9 notice – and whether notice procedures include confirmation of receipt by habeas counsel –
10 raises concerns about whether current safeguards are sufficient to ensure compliance with the
11 Court’s Order.

12 The advance notice requirement exists to preserve meaningful judicial oversight over
13 pending habeas matters. Removal without notice deprived both counsel and the Court of the
14 opportunity to seek emergency relief or otherwise address a fully briefed habeas petition
15 awaiting decision. The significance of that failure does not depend on Respondents’
16 characterization of Petitioner’s motivations.

17 Petitioner recognizes that his removal affects the availability of certain relief originally
18 sought and does not request adjudication of the underlying custody claim on the merits.
19 However, Petitioner respectfully submits that dismissal should not occur without the Court first
20 determining whether Respondents’ submissions adequately explain the violation and whether
21 further clarification or findings are warranted.

22 Petitioner therefore defers to the Court regarding the appropriate disposition of this
23 matter.

Dated: February 25, 2026.

/s/ Caroline K. Medeiros

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