

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GS2,

Petitioner,

vs

LAURA HERMOSILLO, Seattle Acting Field
Office Director, Enforcement and Removal
Operations, United States Immigration and
Customs Enforcement (ICE); **BRUCE SCOTT**,
Warden, Northwest ICE Processing Center;
KRISTI NOEM, Secretary, United States
Department of Homeland Security; **UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY; PAMELA BONDI**, U.S.
Attorney General;

Respondents.

Case No.: 3:25-cv-6168

Agency No.: AXXXXXXXXXX

**PETITION FOR WRIT OF HABEAS
CORPUS PURSUANT TO 28 U.S.C.
§ 2241**

INTRODUCTION

1. This case challenges Respondents' unlawful re-detention of Petitioner GS2. Petitioner is currently in the physical custody of Respondents at the Northwest ICE Processing Center (NWIPC).

2. Petitioner entered without inspection ("EWI") on January 22, 2022, at San Luis, Arizona, and then was apprehended and placed in custody by the U.S. Customs and Border Protection (CPB) and Immigration and Customs Enforcement (ICE), and transferred to San Diego where he held for 3 days in detention. On January 24, 2022, the Notice to Appear was served upon him

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1 by the CBP agent, charging him with “EWI” entry. Since the Petitioner was presumably
2 released on an Order of Recognizance (Form I-220A) with a DHS motion for a change of venue
3 to the non-detained Immigration Court in Sacramento, CA, such Court, on February 9, 2022,
4 cancelled the detained Master calendar hearing. Petitioner then filed on May 10, 2022, his I-589
5 asylum application with this non-detained Court, and then on October 14, 2025, filed the updated
6 I-589 asylum application, his identity documents, proof of his biometrics completion, and his
7 asylum statement. This non-detained Sacramento then, on November 11, 2025, issued the Initial
8 Scheduling Order, and in Response, on December 11, 2025, Petitioner provided Written
9 Pleadings to the Notice of Appear by conceding the factual allegations and conceding the “EWI”
10 charge, but refusing to designate a country of removal, requesting a hearing to adjudicate his
11 asylum claim. Due to his immigration arrest on December 16, 2025, at his non-detained ICE
12 call-in appointment in Tukwila, WA, his case was transferred by ICE to the detained
13 Immigration Court in Tacoma, WA, for a January 21, 2026, Master Calendar hearing. Upon his
14 release from custody on January 25, 2022, with an ankle bracelet, Petitioner received his asylum
15 pending employment authorization document, and built a life in the United States as a trucker
16 with the Commercial Driver License. He has no criminal record in the United States or any
17 country. Exhibit A, Immigration History.

20 3. Since his release, Petitioner has fulfilled his conditions of release. Despite Petitioner’s
21 perfect compliance with ICE and ISOP reporting (with ankle bracelet monitoring for 45 months),
22 he was abruptly and unlawfully re-detained by the Department of Homeland Security (DHS) at
23 his call-in at the non-detained ICE office in Tukwila, WA. Specifically, according to Exhibit B

25 Petitioner’s Declaration:
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1 3. On December 8, 2025 I went to the [Sacramento, CA] ICE offices and told them that I
2 wanted permission to move to the Seattle area . I was told that would be OK and I received
permission. On December 9, 2025, I confirmed again that it was OK for me to go to live in
Kent, WA.

3 4. As I stated above, before I left Sacramento and headed up north. I verified with
4 ICE/ISAP/BI that I was cleared to move to the Seattle area, and I was told to report to ICE
5 on December 16, 2025 at 8:00am. I spoke with a woman at BI, and I verified my move with
6 her. I started driving north on Sunday, December 14, 2025. Shortly after crossing into
Oregon, my ankle bracelet alarm went off and I received a call from a person monitoring my
bracelet. I explained that I had received permission to move and that person told me OK and
that I was "good to go."

7 5. I arrived in Kent, WA in the evening of December 14, 2025.

8 6. On December 16, 2025, I reported to the Immigration and Customs Enforcement Office
9 at 12500 Tukwila International Boulevard . I was arrested and taken into ICE custody and
10 transported to the Northwest ICE Processing Center in Tacoma. I told the arresting officers
that I had received permission to move, but they told me that they had to arrest me. I do
not understand why they insisted on arresting me.

11 7. As I stated above, following my release from custody, ICE placed a GPS tracking ankle
12 bracelet on me. I routinely reported and checked in with ICE through the ankle bracelet and
through my phone. I never missed any reporting or check-in requirements.

13 4. Prior to re-detaining Petitioner, Respondents did not provide any written notice explaining
14 the basis for the revocation of this release. Likewise, Respondents did not assess whether
15 Petitioner presented a flight risk or danger to the community prior to his re-detention or to
16 explain why Petitioner is now a flight risk or danger to the community.

17 5. As this Court has recently held in multiple cases, due process demands a hearing *prior* to
18 the government's decision to terminate a person's liberty. *See, e.g., E.A. T.-B. v. Wamsley*, 795
19 F. Supp. 3d 1316, 1321-24 (W.D. Wash. 2025); *Ramirez Tesara v. Wamsley* --- F. Supp 3d -
20 --, 2025 WL 2637663, at *2-4 (W.D. Wash. Sept. 12, 2025); *Ledesma Gonzalez v. Bostock*,
21 No. 2:25-CV-01404-JNW-GJL, 2025 WL 2841574, at *7-9 (W.D. Wash. Oct. 7, 2025);
22 *Kumar v. Wamsley*, No. 2:25-CV-01772-JHC-BAT, 2025 WL 2677089, at *2-4 (W.D. Wash.
23 Sept. 17, 2025); Report & Recommendation, *Lopez Reyes v. Wamsley*, No. 2:25-cv-01868-

1 JLR-MLP (W.D. Wash. Oct. 15, 2025), Dkt. 13; *YMM v. Wamsley*, No. 2:25-CV- 02075-
2 TMC, 2025 WL 3101782, at *2 (W.D. Wash. Nov. 6, 2025); *P.T. v. Hermosillo*, No. C25-
3 2249-KKE, 2025 WL 3294988, at *4 (W.D. Wash. Nov. 26, 2025); Order, *Francois v.*
4 *Wamsley*, No. 2:25-cv-02122-RSM-GJL (W.D. Wash. Dec. 5, 2025), Dkt. 22 at 8. Many other
5 courts have recently held the same.

6 6. By failing to provide such a hearing, Respondents have violated Petitioner's
7 constitutional rights to due process.

9 7. Accordingly, this Court should grant the instant petition for a writ of Habeas Corpus and
10 order Petitioner's immediate release. See *E.A. T.-B.*, 795 F. Supp. 3d at 1324(ordering immediate
11 release because "a post-deprivation hearing cannot serve as an adequate procedural safeguard
12 because it is after the fact and cannot prevent an erroneous deprivation of liberty"); *Ramirez*
13 *Tesara*, 2025 WL 2637663, at *4 (similar); *Kumar*, 2025 WL 2677089, at *3-4 (similar);
14 *Ledesma Gonzalez*, 2025 WL 2841574, at *9 (similar); *YMM*, 2025 WL 3101782, at *2-3
15 (similar); *P.T.*, 2025 WL 3294988, at *4 (similar).

17 JURISDICTION

18 8. This action arises under the Constitution of the United States and the Immigration and
19 Nationality Act (INA), 8 U.S.C. § 1101 et seq.

20 9. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28
21 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution
22 (Suspension Clause).

24 10. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241

1 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C.
2 § 1651.

3 VENUE

4 11. Venue is proper because Petitioner is in Respondents' custody at the NWIPC in Tacoma,
5 Washington. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-
6 500 (1973), venue lies in the judicial district in which Petitioner is currently in custody.

7 12. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents
8 are employees, officers, and agencies of the United States, and because a substantial part of the
9 events or omissions giving rise to the claims occurred in the Western District of Washington.

11 REQUIREMENTS OF 28 U.S.C. § 2243

12 13. The Court must grant the petition for writ of habeas corpus or issue an order to show
13 cause to the Respondents "forthwith," unless Petitioner is not entitled to relief. 28 U.S.C. § 2243.

14 14. Habeas corpus is "perhaps the most important writ known to the constitutional law ...
15 affording as it does a swift and imperative remedy in all cases of illegal restraint or
16 confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963). "The application for the writ usurps the
17 attention and displaces the calendar of the judge or justice who entertains it and receives prompt
18 action from him within the four corners of the application." *Yong v. I.N.S.*, 208 F.3d 1116, 1120
19 (9th Cir. 2000) (citation omitted); see also *Van Buskirk v. Wilkinson*, 216 F.2d 735, 737-38 (9th
20 Cir. 1954) (habeas corpus is "a speedy remedy, entitled by statute to special, preferential
21 consideration to insure expeditious hearing and determination").

24 PARTIES

25 15. Petitioner G S2 is a citizen of India. He is detained at the NWIPC in Pierce County, WA.

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1 16. Respondent Laura Hermosillo is the Acting Seattle Field Office Director for ICE
2 Enforcement and Removal Operations (ERO). The Seattle Field Office is responsible for local
3 custody decisions relating to noncitizens charged with being removable from the United States.
4 The Seattle Field Office's area of responsibility includes Alaska, Oregon, and Washington.
5 Respondent Hermosillo is a legal custodian of Petitioner and is sued in her official capacity.

6 17. Respondent Bruce Scott is employed by the private corporation The GEO Group, Inc., as
7 Warden of the NWIPC, where Petitioner is detained. He has immediate physical custody of
8 Petitioner. He is sued in his official capacity.

9 18. Respondent Kristi Noem is the Secretary of the Department of Homeland Security
10 (DHS). She is responsible for the implementation and enforcement of the Immigration and
11 Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms.
12 Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

13 19. Respondent U.S. Department of Homeland Security (DHS) is the federal agency
14 responsible for implementing and enforcing the INA, including the detention and removal of
15 noncitizens.
16

17 20. Respondent Pamela Bondi is the Attorney General of the United States, and as
18 such has authority over the Department of Justice. She is sued in her official capacity.
19

20 **FACTUAL BACKGROUND**

21 21. Petitioner entered without inspection ("EWI") on January 22, 2022, at San Luis, Arizona,
22 and then was apprehended and placed in custody by the U.S. Customs and Border Protection
23 (CPB) and Immigration and Customs Enforcement (ICE), and transferred to San Diego where he
24 held for 3 days in detention. On January 24, 2022, the Notice to Appear was served upon him
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1 by the CBP agent, charging him with “EWI” entry. Since the Petitioner was presumably
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 5 asylum application with this non-detained Court, and then on October 14, 2025, filed the updated
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 17 country. Exhibit A, Immigration History.

20 22. Since his release, Petitioner has fulfilled his conditions of release. Despite Petitioner’s
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 22 he was abruptly and unlawfully re-detained by the Department of Homeland Security (DHS) at
 23 his call-in at the non-detained ICE office in Tukwila, WA. Prior to re-detaining Petitioner,
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25 Respondents did not provide any written notice explaining the basis for the revocation of his
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1 release, though being monitored by an ankle bracelet for 27 months Likewise, Respondents did
 2 not assess whether Petitioner presented a flight risk or danger to the community prior to his re-
 3 detention or to explain why Petitioner is now a flight risk or danger to the community.

4 LEGAL FRAMEWORK

5 Due Process Principles

6 23. Due process requires that if DHS seeks to re-arrest a person like Mr. Singh who was
 7 released and given upcoming court dates, has lived in the United States without incident after his
 8 initial release, and has otherwise complied with the terms of his release, the government must
 9 afford a hearing before a neutral decisionmaker to determine whether any re-detention is justified
 10 because the person is a flight risk or danger to the community.
 11

12 24. "Freedom from imprisonment-from government custody, detention, or other
 13 forms of physical restraint-lies at the heart of the liberty protected by the Due Process Clause."
 14 *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). As this Court recently recognized, this is "the most
 15 elemental of liberty interests." *E.A. T.-B.*, 795 F. Supp. 3d at 1321 (quoting *Hamdi v. Rumsfeld*,
 16 542 U.S. 507, 529 (2004)); see also *Ramirez Tesara*, 2025 WL 2637663, at *3 (stating that the
 17 petitioner had "an exceptionally strong interest in freedom from physical confinement").
 18

19 25. Consistent with this principle, individuals released on parole or other forms of
 20 conditional release have a liberty interest in their "continued liberty." *Morrissey v. Brewer*, 408
 21 U.S. 471,482 (1972).
 22

23 26. Such liberty is protected by the Fifth Amendment because, "although
 24 indeterminate, [it] includes many of the core values of unqualified liberty," such as the ability to
 25 be gainfully employed and live with family, "and its termination inflicts a 'grievous loss' on the

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1 [released individual] and often on others." *Id.*

2 27. To protect against arbitrary re-detention and to ensure the right to liberty, due
3 process requires "adequate procedural protections" that test whether the government's asserted

4 28. Due process thus guarantees notice and an individualized hearing before a neutral
5 decisionmaker to assess danger or flight risk before the revocation of an individual's release.
6 *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) ("The fundamental requisite of due process of law
7 is the opportunity to be heard at a meaningful time in a meaningful manner." (citation
8 modified)); see also, e.g., *Morrissey*, 408 U.S. at 485 (requiring "preliminary hearing to
9 determine whether there is probable cause or reasonable ground to believe that the arrested
10 parolee has committed ... a violation of parole conditions" and that such determination be made
11 "by someone not directly involved in the case[.]" (citation modified)).

12 29. Several courts, including this one, have recognized that these principles apply
13 with respect to the re-detention of the many noncitizens that DHS has arbitrarily begun taking
14 back into custody, often after such persons have been released for months and years.

15 30. For example, in *E.A.T.-B.*, this Court applied the *Mathews v. Eldridge*, 424 U.S.
16 319 (1976), framework to hold that even in a case where the government asserted that mandatory
17 detention initially applied, a person's re-detention could not occur absent a hearing. The Court
18 did the same in *Ramirez Tesara*, *Kumar*, and *Ledesma Gonzalez*. See *Ramirez Tesara*, 2025 WL
19 2637663, at *2-3; *Kumar*, 2025 WL 2677089, at *2-3; *Ledesma Gonzalez*, 2025 WL 2841574,
20 at *7-8.

21 31. In applying the three *Mathews* factors, the E.A. T.-B. court held that the petitioner
22 had "undoubtedly [been] deprive[d] ... of an established interest in his liberty," which, as

1 noted, "is the most elemental of liberty interests[.]" 795 F. Supp. 3d at 1321 (citation modified).

2 The Court further explained that even if detention was mandatory, the risk of erroneous
3 deprivation of liberty without a hearing was high because a hearing serves to ensure that the
4 purposes of detention-the prevention of danger and flight risk-are properly served. *Id.* at
5 1322-23. Finally, the Court explained that:

6 [T]he Government's interest in re-detaining non-citizens previously released
7 without a hearing is low: although it would have required the expenditure of finite
8 resources (money and time) to provide Petitioner notice and hearing on [ISAP]
9 violations before arresting and re-detaining him, those costs are far outweighed by
the risk of erroneous deprivation of the liberty interest at issue.

10 *Id.* at 1324. As a result, this Court ordered the petitioner's immediate release. *Id.*

11 32. This Court applied a similar analysis in *Ramirez Tesara*. There, the Court reasoned that the
12 petitioner had a "weighty" interest in his liberty and was entitled to the "full protections of the due
13 process clause." 2025 WL 2637663, at *3. When examining the value of additional safeguards, the
14 Court also noted that despite the government's allegations of ISAP violations, "the fact 'that the
15 Government may believe it has a valid reason to detain Petitioner does not eliminate its obligation
16 to effectuate the detention in a manner that comports with due process.'" *Id.* at *4 (quoting *E.A. T-*
17 *B*, 795 F. Supp. 3d at 1322). Finally, the Court reasoned that any government interest in re-
18 detention without a hearing was "minimal." *Id.* Accordingly, there too, the Court ordered the
19 petitioner's immediate release. *Id.* at *5.

20 33. The *Kumar* and *Ledesma Gonzalez* courts reached the same decision, again holding that all
21 three factors weighed in favor of affording the petitioner a bond hearing. 2025 WL 2677089, at *3-
22 4; 2025 WL 2841574, at *7-9; *see also* Report & Recommendation, *Lopez Reyes*, No. 2:25-cv-
23 01868-JLR-MLP (W.D. Wash. Oct. 15, 2025), Dkt. 13 (same).

34. This Court's decisions in *E.A. T-B.*, *Ramirez Tesara*, *Kumar*, and *Ledesma Gonzalez* are consistent with many other district court decisions addressing similar situations. *See, e.g., Valdez v. Joyce*, --- F. Supp. 3d ---, 2025 WL 1707737 (S.D.N.Y. June 18, 2025) (ordering immediate release due to lack of pre-deprivation hearing); *Garro Pinchi v. Noem*, 792 F.Supp.3d 1025 (N.D. Cal. July 24, 2025) (similar); *Maklad v. Murray*, No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug. 21, 2025) (similar).

35. The same framework and principles apply here and compel the immediate release of Petitioner.

CLAIM FOR RELIEF

Violation Of Fifth Amendment Right To Due Process Procedural Due Process

36. Petitioner restates and realleges all the prior paragraphs as if fully set forth herein.

37. Due process does not permit the government to re-detain Petitioner and strip him of his liberty without written notice and a pre-deprivation hearing before a neutral decisionmaker to determine whether re-detention is warranted based on danger or flight risk. *See Morrissey*, 408 U.S. at 487-88. Such written notice and a hearing must occur *prior* to any re-detention.

38. Respondents revoked Petitioner's release and deprived him of liberty without providing written notice and a meaningful opportunity to be heard by a neutral decisionmaker prior to his re-detention.

39. Accordingly, Petitioner's re-detention violates the Due Process Clause of the Fifth

1 Amendment.

2 **PRAYER FOR RELIEF**

3 WHEREFORE, Petitioner respectfully requests that this Court:

4 (1) Assume jurisdiction over this matter;

5 (2) Require Respondents to show cause within fourteen days of this Petition's filing as to why
6 this Petition should not be granted as required by 28 U.S.C. § 2243, and permitting Petitioner
7 to file a traverse within five days of Respondents' return, *see* W.D. Wash. Gen. Order No. 10-
8 25 & App. A;

10 (3) Issue an Order that prohibits Respondents from transferring Petitioner out of this
11 district during the pendency of the court's adjudication of this petition, or,

12 alternatively, orders Respondents to notify Petitioner and his habeas counsel in
13 advance of any transfer or removal, *see* W.D. Wash. Gen. Order No. 10-25 & App. A;

15 (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody
16 immediately and permanently enjoining his re-detention during the pendency of the removal
17 proceeding absent written notice and a hearing prior to re-detention where Respondents must
18 prove by clear and convincing evidence that Petitioner is a flight risk or danger to the
19 community and that no alternatives to detention would mitigate those risks;

21 (5) Order that upon Petitioner's release, Respondents must return to Petitioner any
22 personal property, including personal identification documents (other than a passport)
23 and employment authorization documents;

24 (6) Declare that the re-detention of Petitioner while removal proceedings are ongoing

1 without first providing an individualized determination before a neutral
2 decisionmaker violates the Due Process Clause of the Fifth Amendment;
3 (7) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act,
4 and on any other basis justified under law; and
5 (8) Grant any further relief this Court deems just and proper.

6 DATED: December 27, 2025.

7 Respectfully submitted,
8 LAW OFFICES OF BART KLEIN
9 s/ Bart Klein
10 Bart Klein, Attorney for Petitioner, WSBA #10909
11 605 First Avenue, Suite 500
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13 (206)755-5651cell
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14 **VERIFICATION**

15 On behalf of Mr. G S2 the party in custody, I verify the facts contained in the Petition for Writ of
16 Habeas Corpus, upon information and belief, having reviewed the relevant records and
17 pleadings. Mr. Singh has not verified the petition himself because he is currently detained at the
Northwest Immigrant ICE Processing Center.

18 s/ Bart Klein, 12/27/2025
19 Bart Klein, WSBA#10909
Attorney for Petitioner

20 **CERTIFICATE OF SERVICE**

21 I, Bart Klein, certify that on December 28, 2025, I filed the foregoing with the Clerk of Court
22 using the CM/ECF system. I further certify that along with this filing, a non-pseudonym copy
23 of the documents will be emailed (with the Court Case Number and full #A listed) immediately
to the attorneys of the "Habeas Section" of the U.S. Attorney's Office, Michelle L. Lambert and
Katherine Grant Collins.

24 I, Bart Klein, further certify that the filed hard copy of the documents will be sent via certified
25 mail to the individuals listed below pursuant to Fed. R. Civ. P. 4:

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11 Secretary of the Department of Homeland Security (DHS)
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16 Laura Hermosillo, Acting Director,
17 Seattle Field Office Enforcement and Removal Operations
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December 28, 2025

s/ Bart Klein,
Bart Klein, WSBA#10909
Attorney for Petitioner

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