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**Pro Hac Vice application pending*
Attorney for Petitioner

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

Mario Cruz Bernabe,	)	File No. Case 2:25-cv-02709-
	)	JHC
Petitioner,	)	
	)	Petitioner's Request for Partial
vs.	)	Grant of Habeas
	)	
LAURA HERMOSILLA Seattle Field Office	)	Expedited Grant Requested
Director, U.S. Immigration and Customs	)	
Enforcement and Removal Operation, KRISTI	)	
NOEM, Secretary of Homeland Security,	)	
PAMELA BONDI, Attorney General, TODD	)	
LYONS, Acting Director of Immigration and	)	
Customs Enforcement, U.S. DEPARTMENT	)	
OF HOMELAND SECURITY, U.S.	)	
IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT, and U.S. DEPARTMENT	)	
OF JUSTICE	)	
	)	
	)	
Respondents.	)	

As acknowledged by Respondent's Return Memorandum, document 19 of the record. Petitioner should be found to be a member of the Rodriguez Vasquez class. Petitioner requests an Order Granting Petition for Habeas Corpus, finding Petitioner Mario Cruz Bernabe to be a Rodriguez Vazquez class member, and ordering his release upon the payment of an alternative bond finding from the Immigration Court.

Petitioners Immigration Court Bond hearing is set for January 20th at 10am. Petitioner has no negative factors which would indicate he would be a flight risk and is confident that a judge will issue an alternative bond.

Petitioner request to reserve the opportunity to file a full Traverse if the immigration court does not issue an alternative bond and requests that the court adjudicate a habeas based on unlawful detention, only if the bond is not granted on January 20.

Petitioner requests an expedited Partial Grant of Habeas as to the Rodriguez Class membership, so that Petitioner's release is not delayed upon the expected alternative bond finding January 20th.

Dated this 01/13/2026

/s/Alicia Vial Beesley

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