

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMADO ARMANDO VALDES-OVIEDO,

Petitioner,

v.

IMMIGRATION AND CUSTOMS
ENFORCEMENT FIELD OFFICE
DIRECTOR,

Respondent.

Case No. 2:25-cv-02720-KKE

FEDERAL RESPONDENT'S
RETURN

Noted for Consideration:
February 2, 2026

I. INTRODUCTION

U.S. Immigration and Customs Enforcement (ICE) has lawfully detained Petitioner Amado Armando Valdez-Oviedo, a citizen of Cuba who is subject to a final removal order, to facilitate his removal from the United States. Petitioner's detention is lawful. He is a noncitizen subject to an administratively final order of removal, and he is lawfully detained under Section 241 of the Immigration and Nationality Act (INA). *See* 8 U.S.C. § 241.13(i)(2).

Petitioner's habeas petition should be denied without an evidentiary hearing for four reasons. First, his order of supervision was properly revoked pursuant to 8 C.F.R. § 241.13(i)(2)

1 due to changed circumstances in that Petitioner can now be removed from the United States to a
2 third country. Second, Petitioner's detention is not indefinite under *Zadvydas v. Davis*, 533 U.S.
3 678, 701 (2001), because ICE believes that removal to a third country is likely in the reasonably
4 foreseeable future. Third, Petitioner has failed to exhaust his administrative remedies; he has not
5 alleged that he has sought a bond hearing or that any bond hearing he was given was procedurally
6 improper or deficient. And fourth, this Court lacks jurisdiction to enjoin Petitioner's re-detention
7 and removal to a third country.

8 **II. FACTUAL AND PROCEDURAL BACKGROUND**

9 **A. Detention Authorities and Removal Procedures**

10 The INA governs the detention and release of noncitizens during and following their
11 removal proceedings. See *Johnson v. Guzman Chavez*, 594 U.S. 523, 527 (2021). The general
12 detention periods are generally referred to as "pre-order" (meaning before the entry of a final order
13 of removal) and, relevant here, "post-order" (meaning after the entry of a final order of removal).
14 Compare 8 U.S.C. § 1226 (authorizing pre-order detention) with § 1231(a) (authorizing post-order
15 detention).

16 When a final order of removal has been entered, a noncitizen enters a 90-day "removal
17 period." 8 U.S.C. § 1231(a)(1). Congress has directed that the Secretary of Homeland Security
18 "shall remove the [noncitizen] from the United States." *Id.* To ensure a noncitizen's presence for
19 removal and to protect the community from noncitizens who may present a danger, Congress has
20 mandated detention while removal is being effectuated. 8 U.S.C. § 1231(a)(2).

21 Section 1231(a)(6) authorizes ICE to continue detention of noncitizens after the expiration
22 of the removal period. Unlike Section 1231(a)(2), Section 1231(a)(6) does not mandate detention
23 and does not place any temporal limit on the length of detention under that provision:

1 [A noncitizen] ordered removed who is inadmissible under section 1182,
2 removable under section 1227(a)(1)(C), 1227(a)(2), or 1227(a)(4) of this title or
3 who has been determined by the [the Secretary of Homeland Security] to be a risk
4 to the community or unlikely to comply with the order of removal, *may* be detained
5 *beyond the removal period* and, if released, shall be subject to the terms of
6 supervision in paragraph (3).

7 8 U.S.C. § 1231(a)(6) (emphasis added).

8 During the removal period, ICE¹ is charged with attempting to effect removal of a
9 noncitizen from the United States. 8 U.S.C. § 1231(a)(1). Although there is no statutory time limit
10 on detention pursuant to Section 1231(a)(6), the Supreme Court has held that a noncitizen may be
11 detained only “for a period reasonably necessary to bring about that [noncitizen’s] removal from
12 the United States.” *Zadvydas*, 533 U.S. at 689. The Supreme Court has further identified six
13 months as a presumptively reasonable time to bring about a noncitizen’s removal. *Id.* at 701.

14 Once it is determined that there is no significant likelihood of removal in the reasonably
15 foreseeable future, noncitizens may be released on an Order of Supervision (OSUP). 8 C.F.R.
16 § 241.13(h). ICE may revoke a noncitizen’s OSUP and return the noncitizen to custody when, on
17 account of changed circumstances, there becomes a significant likelihood of the noncitizen’s
18 removal in the reasonably foreseeable future. 8 C.F.R. § 241.13(i)(2).

19 Here, Petitioner is the subject of an administratively final order of removal that was entered
20 on March 15, 2006, and became final on April 14, 2006, when Petitioner did not appeal. *See*
21 Declaration of Kristin B. Johnson (Johnson Decl.) Ex. D; 8 C.F.R. § 1241.1. ICE was unable to
22 remove Petitioner to Cuba at that time and released Petitioner on an OSUP on June 14, 2006, and
23 another OSUP on January 19, 2018. *See* Johnson Decl. Exs. E-F. Petitioner’s OSUP was revoked
24 and he was re-detained on August 15, 2025. *See* Johnson Decl. Ex. H.

¹ Under 8 C.F.R. § 241.2(b), ICE deportation officers are delegated the Secretary of Homeland Security’s authority to execute removal orders.

1 Thus, the “presumptively reasonable” six-month custody period will expire on or about
2 February 15, 2025. *Zadvydas*, 533 U.S. at 701. ICE recently revoked the OSUP due to changed
3 circumstances in that they believe Petitioner can be removed to a third country. *See* Johnson Decl.
4 Ex. H. Petitioner was recently served with a notice of third country removal to Mexico and to
5 another country. *See* Declaration of Deportation Officer Enrique Rodriguez (Rodriguez Decl.)
6 ¶¶ 12-13; Johnson Decl. Ex. J. These changed circumstances support Petitioner’s current detention
7 as his removal will occur once travel arrangements to a third country have been finalized. Thus,
8 Petitioner’s removal is likely in the reasonably foreseeable future.

9 **B. Petitioner Amado Armando Valdez-Oviedo**

10 Petitioner is a native and citizen of Cuba who was entered the United States at Keywest,
11 Florida, on or about June 4, 1980, after being paroled in as a refugee. *See* Rodriguez Decl. ¶ 4;
12 Johnson Decl. Ex. A.

13 Following his admission to the United States, Petitioner amassed an extensive criminal
14 history related to cocaine possession and trafficking. In 1985, 1987, and 1989, he was arrested
15 for/convicted of three separate VUCSA charges: two for possession and one for attempted
16 delivery. *See* Johnson Decl. Exs. A-B, G. Petitioner was also convicted in King County,
17 Washington, on September 1, 1995, for Delivery of Cocaine, and sentenced to 67 months’ prison.
18 *See* Rodriguez Decl. ¶ 5; Johnson Decl. Exs. A-B, G. On February 14, 2005, Petitioner was
19 convicted in Pierce County, Washington, for Possession Without a Prescription and sentenced to
20 24 months prison and 12 months supervision. *See* Rodriguez Decl. ¶ 5; Johnson Decl. Exs. A-B,
21 G.

22 On February 27, 2006, DHS issued a Notice to Appear (NTA”) alleging, in part, that
23 Petitioner was removable from the United States pursuant to Section 212(a)(2)(A)(i)(II) of the
24

1 Immigration and Nationality Act (INA), in that he was convicted of any law or regulation of a
2 State, the United States, or a foreign country relating to a controlled substance. *See* Rodriguez
3 Decl. ¶ 6; Johnson Decl. Ex. B. On February 27, 2006, Petitioner was served a notice of arrest and
4 custody determination, both under INA § 236, and was detained at the NWIPC in Tacoma,
5 Washington. *See* Rodriguez Decl. ¶ 7; Johnson Decl. Ex. C.

6 An Immigration Judge ordered Petitioner removed to Cuba on March 15, 2006, and
7 Petitioner did not appeal. *See* Rodriguez Decl. ¶ 8; Johnson Decl. Ex. D.

8 On June 14, 2006, Petitioner was placed on an Order of Supervision (OSUP). *See*
9 Rodriguez Decl. ¶ 9; Johnson Decl. Ex. E. He was placed on another OSUP on January 19, 2018.
10 *See* Rodriguez Decl. ¶ 10; Johnson Decl. Ex. F.

11 Petitioner's OSUP was revoked and he was arrested by ICE Enforcement and Removal
12 Operations (ERO) in Seattle, Washington on August 15, 2025. *See* Rodriguez Decl. ¶ 11; Johnson
13 Decl. Ex. H. That same day he was served with a notice of arrest and custody determination and
14 transported to the NWIPC in Tacoma, Washington. *See* Rodriguez Decl. ¶ 11; Johnson Decl. Ex. I.

15 On November 10, 2025, Petitioner was served with a third country notification Mexico, in
16 the Spanish language which he refused to sign. *See* Rodriguez Decl. ¶ 12. On December 23, 2025,
17 the Petitioner was served with another third country notification, which he also refused to sign.
18 *See* Rodriguez Decl. ¶ 13; Johnson Decl. Ex. J.

19 III. LEGAL STANDARD

20 It is axiomatic that "[t]he district courts of the United States . . . are courts of limited
21 jurisdiction. They possess only that power authorized by Constitution and statute." *Exxon Mobil*
22 *Corp. v. Allopah Servs., Inc.*, 545 U.S. 546, 552 (2005) (internal quotations omitted). "[T]he scope
23 of habeas has been tightly regulated by statute, from the Judiciary Act of 1789 to the present day."
24

1 *Dep't of Homeland Sec. v. Thuraissigiam*, 140 S. Ct. 1959, 1974 n.20 (2020). Title 28 U.S.C.
 2 § 2241 provides district courts the authority to grant habeas relief “within their respective
 3 jurisdictions.” To warrant a grant of habeas corpus, the burden is on the petitioner to prove that his
 4 or her custody is in violation of the Constitution, laws, or treaties of the United States. *See*
 5 28 U.S.C. § 2241(c)(3); *Lambert v. Blodgett*, 393 F.3d 943, 969 n.16 (9th Cir. 2004).

6 7 **IV. ARGUMENT**

8 **A. Petitioner’s order of supervision was lawfully revoked, and he was lawfully re-** 9 **detained.**

10 Petitioner is subject to a final order of removal and ICE lawfully revoked his OSUP because
 11 they determined that there is now a significant likelihood that Petitioner can be removed from the
 12 United States in the foreseeable future. *See* Rodriguez Decl. ¶ 11. ICE may revoke a noncitizen’s
 13 OSUP under 8 C.F.R. § 241.13 when:

14 (i) Revocation of release—

15 (1) Violation of conditions of release. Any alien who has been released under an
 16 order of supervision under this section who violates any of the conditions of release
 17 may be returned to custody and is subject to the penalties described in section
 243(b) of the Act. In suitable cases, the HQPDU shall refer the case to the
 appropriate U.S. Attorney for criminal prosecution. The alien may be continued in
 detention for an additional six months in order to effect the alien’s removal, if
 possible, and to effect the conditions under which the alien had been released.

18 (2) Revocation for removal. The Service may revoke an alien’s release under this
 19 section and return the alien to custody if, on account of changed circumstances, the
 20 Service determines that there is a significant likelihood that the alien may be
 21 removed in the reasonably foreseeable future. Thereafter, if the alien is not released
 from custody following the informal interview provided for in paragraph (h)(3) of
 this section, the provisions of § 241.4 shall govern the alien’s continued detention
 pending removal.

22 (3) Revocation procedures. Upon revocation, the alien will be notified of the
 23 reasons for revocation of his or her release. The Service will conduct an initial
 24 informal interview promptly after his or her return to Service custody to afford the
 alien an opportunity to respond to the reasons for revocation stated in the
 notification. The alien may submit any evidence or information that he or she

1 believes shows there is no significant likelihood he or she be removed in the
2 reasonably foreseeable future, or that he or she has not violated the order of
3 supervision. The revocation custody review will include an evaluation of any
4 contested facts relevant to the revocation and a determination whether the facts as
5 determined warrant revocation and further denial of release.

6 8 C.F.R. § 241.13.

7 Here, there has been a change in circumstances which indicate Petitioner's removal to from
8 the United States is likely in the reasonably foreseeable future. While ICE had been unable to
9 obtain a travel document to conduct Petitioner's removal to Cuba for decades, ICE now believes
10 that Petitioner can be removed to a third country. *See* Johnson Decl. Ex. H. Petitioner received
11 notification of the reason for the OSUP revocation on August 15, 2025, when he was taken into
12 custody, and has received two notices of removal to third countries.² *Id.*; Rodriguez Decl. ¶¶ 12-
13 13; Johnson Decl. Ex. J. Accordingly, Petitioner was lawfully re-detained following the revocation
14 of his OSUP due to changed circumstances. 8 C.F.R. § 241.13(i)(2)

15 **B. Petitioner's detention is not indefinite or unconstitutionally prolonged.**

16 Petitioner has not demonstrated that his detention has become "indefinite" or
17 unconstitutional. In *Zadvydas*, the Supreme Court analyzed whether the potentially open-ended
18 duration of detention pursuant to 8 U.S.C. § 1231(a)(6) is constitutional. The Court read an implicit
19 limitation of post-removal detention "to a period reasonably necessary to bring about that alien's
20 removal from the United States." *Zadvydas*, 533 U.S. at 689. It was further specified that Section
21 1231(a)(6) does not permit indefinite detention. *Id.* Thus, "once removal is no longer reasonably
22 foreseeable, continued detention is no longer authorized by statute." *Id.* at 699.

23 //

24 ² At this time, Respondent is unable to confirm whether Petitioner received an informal interview pursuant
to 8 C.F.R. § 241.13(i)(3).

1 The *Zadvydas* Court recognized that as the length of detention grows, a sliding scale of
2 burdens is applied to assess the continuing lawfulness of a noncitizen's post-order detention. *Id.*
3 (stating that "for detention to remain reasonable, as the period of post-removal confinement grows,
4 what counts as the 'reasonably foreseeable future' conversely would have to shrink"). However,
5 the Supreme Court determined that it is "presumptively reasonable" for the Government to detain
6 a noncitizen for six months following entry of a final removal order, while it worked to remove
7 the noncitizen from the United States. *Id.* at 701. Thus, the Supreme Court implicitly recognized
8 that six months is the *earliest* point at which a noncitizen's detention could raise constitutional
9 issues. *Id.* Moreover, the Supreme Court noted the six-month presumption "does not mean that
10 every [noncitizen] not removed must be released after six months. To the contrary, [a noncitizen]
11 may be held in confinement until it has been determined that there is no significant likelihood of
12 removal in the reasonably foreseeable future." *Id.*

13 Here, Petitioner has been detained for less than seven months following the revocation of
14 his OSUP on August 25, 2025, and it appears he was detained for only three months in 2006
15 following entry of the final order of removal on March 15, 2006, until he was released on an OSUP
16 on June 14, 2006. *See* Johnson Decl. Exs. D, E, H. In total, Petitioner has been detained just a few
17 months beyond the presumptively reasonable six-month period under *Zadvydas* while the
18 government works to effectuate his removal from the United States.

19 While Petitioner is not cooperating with ICE's efforts to remove him to a third country (by
20 refusing to sign the notices of third country removal), there is good reason to believe that there is
21 a significant likelihood of removal in the reasonably foreseeable future. Petitioner has not
22 submitted any evidence that Mexico or another country will not issue a travel document for him.

1 Thus, Petitioner's removal is likely in the reasonably foreseeable future and is not yet indefinite or
2 unconstitutionally prolonged under *Zadvydas*.

3 The fact that Petitioner does not yet have a specific date of anticipated removal does not
4 make his detention indefinite. *Diouf v. Mukasey*, 542 F. 3d 1222, 1233 (9th Cir. 2008). Detention
5 becomes indefinite in situations where the country of removal refuses to accept the noncitizen or
6 if removal is legally barred. *Id.* There is no reason to believe that is the situation here.
7 Consequently, Petitioner has failed to demonstrate a good reason to believe that there is no
8 significant likelihood of his removal in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at
9 701.

10 With his removal pending, the government has significant legitimate interests in
11 Petitioner's continued detention to ensure he will appear for removal. Petitioner poses a risk of
12 flight because he alleges no avenue to seek relief from removal. Moreover, his detention has not
13 become "indefinite," and his removal is significantly likely in the reasonably foreseeable future.
14 This Court should deny Petitioner's request for immediate release.

15 **C. Petitioner has failed to exhaust his administrative remedies.**

16 Petitioner has failed to exhaust his administrative remedies; he has not alleged that he has
17 sought a bond hearing or that any bond hearing he was given was procedurally improper or
18 deficient. This Court should require Petitioner to seek a bond hearing administratively, and if
19 dissatisfied with the result, appeal that ruling to the Board of Immigration Appeals (BIA) before
20 seeking habeas relief in a federal district court.

21 Although exhaustion of administrative remedies is not a jurisdictional prerequisite for
22 habeas petitions, courts generally "require, as a prudential matter, that habeas petitioners exhaust
23 available judicial and administrative remedies before seeking [such] relief." *Castro-Cortez v. INS*,

1 239 F.3d 1037, 1047 (9th Cir. 2001) (abrogated on other grounds by *Fernandez-Vargas v.*
2 *Gonzales*, 548 U.S. 30 (2006)). The exhaustion requirement is subject to waiver because it is not
3 a “‘jurisdictional’ prerequisite.” *Id.*

4 Courts may require prudential exhaustion where: “(1) agency expertise makes agency
5 consideration necessary to generate a proper record and reach a proper decision; (2) relaxation of
6 the requirement would encourage the deliberate bypass of the administrative scheme; and
7 (3) administrative review is likely to allow the agency to correct its own mistakes and to preclude
8 the need for judicial review.” *Puga v. Chertoff*, 488 F.3d 812, 815 (9th Cir. 2007).

9 The Court should not allow Petitioner to move forward with this litigation without first
10 exhausting his administrative remedies at the Immigration Court and the BIA. Similarly, a court
11 in this district dismissed a noncitizen’s habeas petition because the petitioner had failed to seek a
12 bond redetermination hearing at the administrative level. *Cristobal v. Asher*, 20-cv-1493-RSM-
13 BAT, 2020 WL 8678097, at *3 (W.D. Wash. Dec. 14, 2020), *Rep. & Rec. adopted by* 2021 WL
14 796597 (W.D. Wash. Mar. 2, 2021). In *Cristobal*, the petitioner had been detained for 15 months
15 and was denied bond at an initial bond redetermination hearing, but he never sought a second bond
16 redetermination hearing based on changed circumstances before filing a habeas petition. In
17 comparison, Petitioner here does not allege that he has sought a bond hearing, or been denied bond,
18 or that any bond hearing he had was deficient before filing a habeas petition in this Court asking
19 this Court to order a bond hearing. Therefore, this Court should also dismiss this Petition.

20 Furthermore, this case meets the elements requiring prudential exhaustion because the BIA
21 “has a special expertise in reviewing the question of whether the bond record as a whole makes it
22 substantially unlikely that the Department w[ill] prevail on [the petitioner’s] challenge to
23 removability.” *Francisco Cortez v. Nielsen*, No. 19-CV-00754-PJH, 2019 WL 1508458, at *3

(N.D. Cal. Apr. 5, 2019) (internal quotation marks omitted). Also, allowing a “relaxation of the exhaustion requirement” would promote the avoidance of seeking a bond redetermination by the Immigration Judge or an appeal of similar Immigration Judge orders to the BIA. Finally, the outcome of Petitioner’s exhaustion of administrative remedies may provide him with the relief sought here – a bond hearing or release on bond.

Accordingly, the Petition should be dismissed because Petitioner has failed to exhaust his administrative remedies.

D. This Court lacks jurisdiction to enjoin Petitioner’s re-detention and removal to a third country.

In the exercise of its constitutional power to define federal court jurisdiction, in 1996, Congress enacted the Illegal Immigration Reform and Immigrant Responsibility Act (“IIRIRA”), which repealed the existing scheme for judicial review of final orders of deportation, and replaced it with a more restrictive scheme. *See Reno v. American-Arab Anti-Discrimination Committee (“AADC”)*, 525 U.S. 471, 474 (1999). Among the IIRIRA amendments to the INA, Congress provided in the newly-enacted Section 1252(g) that reads as follows:

Except as provided in this section and notwithstanding any other provision of law, no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this Act.

8 U.S.C. § 1252(g) (1996). In the 2005 REAL ID Act, Congress amended Section 1252(g) to clarify that the statute’s proscription against jurisdiction does in fact apply to habeas actions, such as the one Petitioner now brings before this Court. *See REAL ID Act of 2005*, Pub. L. No. 109-13, 119 Stat. 231, 310-11 (amending 8 U.S.C. § 1252(g)). As amended by the REAL ID Act, Section 1252(g), now provides that:

1 Except as provided in this section and notwithstanding any other provision of law,
2 (statutory or nonstatutory), including section 2241 of Title 28, or any other habeas
3 corpus provision, and sections 1361 and 1651 of such title, no court shall have
4 jurisdiction to hear any cause or claim by or on behalf of any alien arising from the
5 decision or action by the Attorney General to commence proceedings, adjudicate
6 cases, or execute removal orders against any alien under this chapter.

7 8 U.S.C. § 1252(g) (2017) (emphasis added).

8 In addition to the bar to jurisdiction at Section 1252(g), the IIRIRA and REAL ID Act
9 amendments to the INA also reflect Congress's desire to "streamline immigration proceedings"
10 and to "effectively limit all aliens to one bite of the apple with regard to challenging an order of
11 removal." *Singh v. Gonzales*, 499 F.3d 969, 976-77 (9th Cir. 2007) (quoting *Bonhometre v.*
12 *Gonzales*, 414 F.3d 442, 446 (3d Cir. 2005)). Under these amendments, individuals who seek to
13 challenge an order of removal may do so, but only as part of a petition for review in the appropriate
14 court of appeals, as provided under Section 1252. In particular, Section 1252(b)(9) provides that:

15 Judicial review of all questions of law and fact, including interpretation and
16 application of constitutional and statutory provisions, arising from any action taken
17 or proceeding brought to remove an alien from the United States under this
18 subchapter shall be available only in judicial review of a final order under this
19 section. Except as otherwise provided in this section, no court shall have
20 jurisdiction, by habeas corpus under section 2241 of Title 28 or any other habeas
21 corpus provision, by section 1361 or 1651 of such title, or by any other provision
22 of law (statutory or nonstatutory), to review such an order or such questions of law
23 or fact.

24 8 U.S.C. § 1252(b)(9) (emphasis added); see also 8 U.S.C. § 1252(a)(5) ("Notwithstanding any
other provision of law (statutory or nonstatutory), including section 2241 of Title 28, or any other
habeas corpus provision, and sections 1361 and 1651 of such title, a petition for review filed with
an appropriate court of appeals in accordance with this section shall be the sole and exclusive
means for judicial review of an order of removal . . .").

//

Thus, this Court lacks jurisdiction to enjoin ICE from revoking Petitioner's OSUP, re-detaining him, and executing his final order of removal by removing him to a third country.

V. CONCLUSION

For the foregoing reasons, Petitioner's habeas petition should be denied and dismissed without an evidentiary hearing.

DATED this 26th day of January, 2026.

Respectfully submitted,

CHARLES NEIL FLOYD
United States Attorney

s/ Kristin B. Johnson

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I certify that this memorandum contains 3,728 words,
in compliance with the Local Civil Rules.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers;

I further certify that on this date, I electronically filed the foregoing and the supporting declarations of Enrique Rodriguez and Kristin B. Johnson (with Exhibits A-J), with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

- 0 -

I further certify that on this date, I arranged for service of the foregoing on the following non-CM/ECF participant via Certified Mail, Return Receipt Requested, postage prepaid, marked “*Legal Mail, Open in Presence of Detainee*,” and addressed as follows:

Amado Armando Valdes-Oviedo, *Pro Se Petitioner*

A# 

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DATED this 26th day of January, 2026.

s/ Caitlin Froelich

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FEDERAL RESPONDENT'S RETURN
[2:25-cv-02720-KKE] - 15

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