

1 Niraj Bhandari
2 Northwest Detention Center
3 1623 East J Street
4 Tacoma, WA 98421-1615

5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 NIRAJ BHANDARI,

9 Petitioner,

10 vs.

11 PAMELA BONDI, Attorney General of
12 the United States; KRISTI NOEM,
13 Secretary, United States Department of
14 Homeland Security; LAURA
15 HERMOSILLO, Acting Seattle Field
16 Office Director, United States
Citizenship and Immigration Services;
BRUCE SCOTT, Warden of Immigration
Detention Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

) No.

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)
) **MOTION FOR APPOINTMENT OF**
) **COUNSEL**

17 Petitioner Niraj Bhandari requests that the Court appoint the Office of the
18 Federal Public Defender for the Western District of Washington, or such other counsel
19 as the Court may deem appropriate, to represent him in this matter. Petitioner does not
20 have the financial resources to retain counsel as he is presently in custody. For this
21 reason, and because the present petition presents novel and complex issues of law,
22 appointment of counsel would serve the interests of justice. Many other ICE detainees
23 are or will be raising similar habeas challenges against Respondents, and this Court will
24 benefit from the contributions of experienced, federal counsel in examining these
25 claims. In addition, if an evidentiary hearing is necessary in this case, Petitioner will
26 need the assistance of counsel for such a hearing.

1 Counsel has discussed eligibility for IFP status with Petitioner. Signed financial
2 forms will be filed with his petition.
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4 DATED this 31st day of December 2025.

5 Respectfully submitted,

6 s/ *Andrew D. Kennedy*
7 Assistant Federal Public Defender
8 On behalf of Niraj Bhandari
9 Northwest Detention Center
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