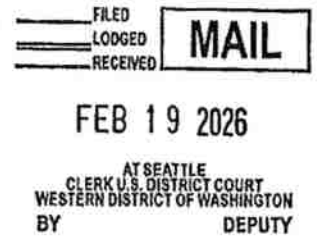


Name: *Quintanilla Miguel Edgar*
1623 EAST J STREET SUITE FIVE
TACOMA, WASHINGTON 98421



UNITED STATES DISTRICT COURT

IN AND FOR THE WESTERN DISTRICT OF WASHINGTON

Name: Edgar Miguel Quintanilla

Petitioner

vs.

ICE Field Office Director

Respondent

) Case No: 26-CV-00041-RSM

REPLY TO RESPONSE TO MOTION

The Petitioner is currently held in custody of the Attorney General at Tacoma's Northwest Detention Center in Tacoma Washington.

Here, the Petitioner moves this Court to

1. Be immediately released from detention under *Zadvydas v. Davis*, 533 U.S. 678, 689, 121, S. Ct. 2491, 150 L. Ed. 2D 653 (2001);[*702] V. 208 F. 3d at 831 and n. 30.
2. Provide me with a hearing in which the government must show I'm a risk of flight or danger to the community before re-detaining me as required by the due process clause.
3. Not to remove me to a third country in an unconstitutionally, punitive manner and provide me with a notice and an opportunity to respond to any third country removal attempt in a re-opened removal proceeding, (*KHIM v. BONDI*)

1
2 Your honor First of all since I came to
3 the United States I've not been a part or
4 member of any gang. nor I'm a Gang member

5
6
7
8
9
10 Badly injuries or death. reason why I left the
11 country and came to the United States.

12
13 Now when It came to my ankle Monitor my
14 attorney and I went to talk to Ica and the
15 monitors to explain that the monitor was
16 defective, that it only charge for a max
17 period of 2 hours. and that I needed to
18 Replace It. as to comply with the Rules.
19 and for the misunderstanding that I was
20 purposely failing to follow the Rules.
21 inclusive I would sometimes had to
22 leave work the monitor was low on charge
23 and charge it at home. I never failed to
24 go to my Ica appointments, and as to
25 my flight risk it never factually pertain
26 to me since I complied as best I could
27 given the circumstances. I have strong
28 family ties and employment I will follow the
supervision imposed on me to the letter. I have a new
born and this is causing hardship to my wife and child.

1 thank you for your time.

2 2-13-2026

3
4 Edgar Quintanilla

5
6 A#



SIMILAR CASE GRANTING HABEAS CORPUS UNDER 2241

Gil v. Lyons----Veiga v. Bondi---Olea v. Bondi

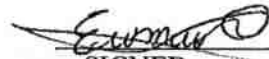
Kuot v. Bondi, 2025 U.S. Dist. LEXIS 267683 case NO. 2:25-cv-02313-BAT. [*9] also Huyna v. Bondi,

C 25-2371-KKE, 2025 U.S. Dist. LEXIS 26538 (WD. WASH De. 23, 2025.

VERIFICATION

I, Edgar Miguel Quintanilla, do hereby aver that the words above are the truth and the entire truth, that I will testify to those facts under penalty of perjury and I provide this information based upon personal belief that they are the facts of this matter, except where stated on personal belief. Submitted under the penalty of perjury of the laws of the United States.

Dated this 16-02-26



SIGNED _____

PROOF OF SERVICE

&

DECLARATION

Edgar Miguel Quintanilla, AVER THAT I AM A PARTY TO THIS ACTION DO HEREBY AVER THAT I HAVE PROVIDED A COPY OF THE FOREGOING DOCUMENT:

REPLY TO RESPONSE TO MOTION

**U.S. District Court
Clerk's Office
700 Stewart Street, Suite 2310
Seattle, Washington 98101**

CHARLES NIEL FLOYD
700 Stewart Street, Suite 5220
Seattle WA. 98101-1271

I WILL TESTIFY UNDER THE PENALTY OF PERJURY THAT THIS IS THE TRUTH.

THE ITEMS WERE MAILED FIRST CLASS MAIL ON THE DATE BELOW.

SUBMITTED ON 02-16-26

SIGNED *Edgar Miguel Quintanilla*