Chief Magistrate Judge Theresa L. Fricke

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

KEVIN ALEXANDER QUINONEZ TORRES,

Petitioner,

v.

JULIO HERNANDEZ, *et al.*,[1]

Respondents.

Case No. 2:26-cv-00076-TLF

FEDERAL RESPONDENTS' RESPONSE TO PETITIONER'S APPLICATION FOR ATTORNEY'S FEES

Federal Respondents submit this response to Petitioner's Motion for Attorney's Fees and Costs under the Equal Access to Justice Act ("EAJA"), 28 U.S.C. § 2412. Dkt. No. 18. Without admitting that Federal Respondents acted without substantial justification in regard to the matters that are the subject of the Petition for Habeas Corpus filed by Petitioner Kevin Alexander Quinonez Torres, Federal Respondents do not oppose Petitioner's request for an award of attorneys' fees and costs in an amount determined to be appropriate by the Court but not to exceed the amount requested by Petitioner in his motion ($4,708.97).

[1] Pursuant to Fed. R. Civ. P. 25(d), Federal Respondents substitute Acting Seattle Field Office Director, U.S. Immigration and Customs Enforcement Julio Hernandez for Laura Hermosillo.

Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

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If Petitioner intends for payment of the fee award to be made directly to counsel, Federal Respondents request that Petitioner provide proof of assignment of his right to receive fees to counsel. *See Astrue v. Ratliff*, 560 U.S. 586, 589 (2010) (holding that an award of fees under EAJA is payable to the litigant).

DATED this 2nd day of June, 2026.

Respectfully submitted,

s/ Lawrence Van Daley
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Attorney for Federal Respondents

I certify this memorandum contains 151 words, in compliance with the Local Civil Rules.