

BENJAMIN CORNELL, WSB #49553
ASCENT LEGAL, PLLC
5401 South Tacoma Way, Office 13
Tacoma, WA 98409
Office: (253) 300-6819
ben@ascentlegal.net

Attorney for Petitioner

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

JOSE ZAMBRANO-VAZQUEZ,
Petitioner,

v.

KRISTI NOEM, Secretary for the Department
of Homeland Security; TODD LYONS, Acting
Director, Immigration and Customs
Enforcement; LAURA HERMOSILLO, Field
Office Director, Immigration and Customs
Enforcement Seattle Field Office; BRUCE
SCOTT, Warden, Northwest ICE Processing
Center,

Respondents.

Case No. 2:26-cv-00122-RSM

**MOTION FOR RELIEF FROM
DEADLINE TO FILE PETITIONER'S
TRAVERSE TO FEDERAL
RESPONDENTS' RETURN
MEMORANDUM**

1 Petitioner, Mr. Jose Zambrano-Vazquez, moves the Court under LCR 7(j) for relief from
2 a deadline, specifically regarding the filing of his traverse to the Respondents' return
3 memorandum. This filing was due by February 2, 2026, and was submitted less than one hour
4 into February 3.

5 Counsel has submitted an untimely traverse as he had five deadlines which fell on today's
6 date. In addition to this filing, he necessarily had to file a response to a DHS motion to pretermi
7 in immigration court, an EOIR-42B in advance of a hearing to take place at 9:30 A.M. on
8 February 3, a notice of appeal to the Board of Immigration Appeals, and a submission of bond
9 evidence due at the Tacoma Immigration Court. Counsel apologizes for being untimely, but
10 given the short length of his tardiness and the circumstances of today, he argues that good cause
11 may be found to grant relief.

12
13 Respectfully submitted,

14 Dated: February 3rd, 2026

15 s/ Benjamin Cornell
16 BENJAMIN CORNELL, WSB #49533
17 Ascent Legal, PLLC
18 5401 South Tacoma Way, Office 13
19 Tacoma, WA 98409
20 Office: (253) 300-6819
21 ben@ascentlegal.net
22 *Attorney for Petitioner*

23 I certify that this motion conforms with the local rules as it is 291 words in length.
24