

1 Wilfredo Rivas Castillo
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 WILFREDO RIVAS CASTILLO,
9 Petitioner,
10 vs.

) No.

) **MOTION FOR APPOINTMENT OF
COUNSEL**

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,

17 Respondents.

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

1 Counsel has discussed eligibility for IFP status with Petitioner, and a Declaration
2 and Application to Proceed in Forma Pauperis has been filed with the petition.
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4 DATED this 14th day of January 2025.

5 Respectfully submitted,

6
7 *s/ Ann K. Wagner*
8 Assistant Federal Public Defender
9 On behalf of
10 Wilfredo Castillo Rivas
11 Northwest Detention Center
12 1623 East J Street
13 Tacoma, WA 98421-1615
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