

HONORABLE JUDGE JAMAL WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Son Truong VO,	)	Civil Case No. 26-cv-00135-JNW
	)	
<i>Petitioner,</i>	)	
	)	
v.	)	
	)	PETITIONER'S UNOPPOSED MOTION
Bruce SCOTT, Warden, Northwest ICE	)	REGARDING THIRD COUNTRY
Processing Center; Laura HERMOSILLO,	)	REMOVAL AND FACILITY TRANSFER
Enforcement and Removal Operations, Seattle	)	
Field Office Director, U.S. Immigration and	)	
Customs Enforcement; Kristi NOEM,	)	Note on motion calendar: January 21, 2026
Secretary, U.S. Department of Homeland	)	
Security; U.S. DEPARTMENT OF	)	
HOMELAND SECURITY; Todd LYONS,	)	
Acting Director and Senior Official	)	
Performing Duties of Director of ICE;	)	
U.S. IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT,	)	
	)	
<u><i>Respondents.</i></u>		

Petitioner Son Truong Vo has filed a habeas corpus petition challenging his detention at the Northwest ICE Processing Center. Dkt. 1. In that petition, he seeks an order preventing his removal to a country other than Vietnam.

The Petitioner, having met and conferred with Federal Respondents, moves as follows:

STIPULATION REGARDING THIRD COUNTRY
REMOVAL AND FACILITY TRANSFER
Case No. 2:26-cv-00135-JNW

1

The Habeas Project, PLLC
20415 72nd Ave. S, Suite 415
Kent, WA 98032
(917) 690-2038

1 (1) U.S. Immigration and Customs Enforcement ("ICE") will not remove Petitioner to a
2 third country prior to an order being entered by this Court in this habeas action.

3 (2) ICE will not move or transfer Petitioner from the Western District of Washington or
4 remove him from the United States prior to an order being entered by this Court in this habeas
5 action. while this litigation is pending.

6
7 Undersigned counsel conferred with the Assistant United States Attorney assigned to this matter
8 and was informed Federal Respondents do not oppose this motion.

9
10 Dated this 21th day of January, 2026.

11 Respectfully submitted,

12 Jennifer Pasquarella
13 s/ Jennifer Pasquarella
14 JENNIFER PASQUARELLA
15 The Habeas Project, PLLC
16 20415 72nd Ave S, Suite 415
17 Kent, WA 98032
18 (917) 690-2038
19 jennie@thehabeasproject.com
20 *Attorney for Petitioner*

[PROPOSED ORDER]

Federal Respondents shall not move or transfer Petitioner from the Western District of Washington or remove him from the United States prior to the Court entering an order resolving Petitioner's claims in this habeas action.

Petitioner's claims against Third Country Removal will be held in abeyance, unless Petitioner's counsel is notified by Federal Respondents that they intend to seek removal of Petitioner to a third country or until an order on Petitioner's claims is entered by this Court in this habeas action, whichever is earlier. Should Federal Respondents chose to seek removal of Petitioner to a third country before the Court rules on this habeas petition, Federal Respondents shall provide Petitioner's counsel at least 48 hours' notice (or 72 hours' notice if the period extends into a weekend, holiday, or date the Court is closed) prior to any action to seek removal of Petitioner to a third country. However, in such circumstances, the prohibition against Federal Respondents removing Petitioner prior to the Court entering an order resolving Petitioner's habeas claims remains in effect. If Federal Respondents notify counsel of an intent to remove Petitioner to a third country, the parties shall file a joint status report, including a proposed briefing schedule on the third-country removal claims, within three (3) Court days of such notice.

It is so ORDERED.

Dated this ____ day of _____, 2026.

JAMAL WHITEHEAD
United States District Judge