Magistrate Judge Michelle L. Peterson

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

RONIA MOHAMMADI, Petitioner, v. PAMELA BONDI, *et al.*, Respondents.	Case No. 2:26-cv-00420-MLP NOTICE OF INTENT TO OPPOSE MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65(b)(5), Federal Respondents respectfully submit this notice of intent to oppose Petitioner's Motion for Temporary Restraining Order ("TRO") (Dkt. 2), should the Court determine that a response is necessary. If the Court requires briefing, Federal Respondents respectfully request a meaningful opportunity to respond.

However, the Court should deny the TRO without ordering a response because: (1) the Petitioner may raise national security concerns that require careful review on a full, non-abbreviated timeline; (2) the motion fails to establish any basis contemplated by General Order 10-25 for adjudicating the underlying habeas petition on the emergency timeline applicable to a TRO; and (3) the TRO is procedurally deficient.

First, this matter may implicate national security considerations that necessarily warrant

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careful review that simply cannot be completed on a truncated timetable. Any case that potentially flags national security concerns warrants a more detailed assessment than can be completed within the abbreviated timeline of TRO proceedings. Granting emergency relief without such analysis could create irreparable harm to Respondents and the public at large. The Court's orderly habeas process is designed to permit precisely the type of considered review that these concerns demand.

Second, Petitioner presents no facts separating this case from any other immigration habeas petition subject to General Order 10-25.

On December 19, 2025, the United States District Court for the Western District of Washington issued General Order 10-25 regarding immigration habeas petitions under 28 U.S.C. § 2241. Paragraph 5 of General Order 10-25 provides:

> "The standard scheduling order is intended to provide a prompt resolution to habeas petitions that should reduce the contemporaneous filing of motions for temporary restraining orders seeking release from custody or the relief that is otherwise requested by the habeas petition. Motions for temporary restraining orders should be reserved for matters where the petitioner alleges imminent, irreparable harm, ***such as imminent removal from the United States***."

GO 10-25 (emphasis added).

The limited category of TROs contemplated by General Order 10-25 addresses circumstances that adjudication of the habeas petition could not remedy, such as an imminent removal from the United States that would render the Court's eventual decision meaningless. The General Order thus requires a date-certain event threatening to defeat the very relief sought in habeas—most notably, removal from the United States. Here, however, Petitioner seeks only release from the Northwest ICE Processing Center ("NWIPC"), the identical relief requested in her habeas petition. She identifies no impending event that would moot habeas review, and she seeks no relief beyond what ordinary adjudication of the petition would provide. Under the plain

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terms of the General Order, such circumstances do not warrant emergency TRO intervention.

Indeed, the TRO here challenges the same detention conditions faced by all other detainees at the NWIPC and alleges generalized mental anguish that many asylum seekers could assert. If those allegations were sufficient for a TRO, many—if not most—habeas cases could qualify for a TRO, rendering General Order 10-25 meaningless in the aggregate. The unprecedented habeas docket this District has worked diligently to manage could again become unworkable, and the purpose of the General Order to create prompt but orderly resolution could be defeated. This motion effectively seeks to skip the line of pending habeas cases without any persuasive justification. Thus, Petitioner cannot demonstrate immediate, irreparable harm, and the Court should decline to issue a TRO.

Third, Petitioner's TRO motion does not satisfy Federal Rule of Civil Procedure 65(b). Rather than presenting specific, verified facts demonstrating immediate injury, Petitioner merely repeats facts from her habeas petition and recites the general legal factors governing TROs without adding any facts establishing irreparable harm beyond ordinary habeas relief. Such pleading is insufficient to invoke the Court's emergency powers, especially where General Order 10-25 precludes this type of TRO.

For these reasons, Respondents respectfully request that the Court deny the TRO without requiring further opposition briefing and proceed with adjudication of the habeas petition in accordance with General Order 10-25. This approach faithfully applies Rule 65, honors the Court's General Order, and ensures that any matters potentially implicating national security receive the deliberate consideration they require.

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Dated this 5th day of February, 2026.

Respectfully submitted,

s/ Alixandria K. Morris
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