

District Judge Tiffany M. Cartwright

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

NORA MENDOZA AGUILAR, *et al.*,

Petitioner,

v.

JULIO HERNANDEZ, *et al.*,

Respondents.

Case No. 2:26-cv-00761-TMC

STIPULATED MOTION TO DISMISS
AND [PROPOSED] ORDER

Noted for Consideration:
March 26, 2026

Petitioners filed the instant habeas action seeking an order prohibiting their removal and detention unless they are subject to a final order of removal in the future, as well as prohibiting the government from imposing different reporting requirements absent changed circumstances. Dkt. No. 1. To resolve this matter without further litigation, the parties, through counsel, stipulate and move to dismiss the habeas petition without prejudice, and with all parties to bear their own fees and costs, on the following terms:

1. Respondents agree that U.S. Department of Homeland Security (“DHS”) will not re-detain Petitioners until there is an executable final removal order, when the removal period begins under 8 U.S.C. 1231(a)(1), providing Petitioners continue to comply with their current

1 reporting requirements. The parties agree that Petitioners' current reporting requirements consist
2 of one monthly home visit and one monthly office visit.

3 2. Respondents agree to notify Petitioners and undersigned counsel three business
4 days before taking any enforcement action on violations of reporting requirements, in so providing
5 Petitioners with an opportunity to address the alleged violation(s).

6 The parties submit that this agreement fully resolves this litigation and respectfully request
7 that this Court enter an order setting forth the terms of this stipulated agreement and dismiss this
8 case without prejudice and with each party to bear their own fees and costs.

9 DATED this 26th day of March, 2026.

10 Respectfully submitted,

11 s/ Michelle R. Lambert

MICHELLE R. LAMBERT, NYS #4666657

12 Assistant United States Attorney

United States Attorney's Office

13 Western District of Washington

1201 Pacific Ave., Ste. 700

14 Tacoma, WA 98402

Phone: (253) 428-3824

15 Fax: (253) 428-3826

Email: michelle.lambert@usdoj.gov

16 *Attorney for Federal Respondents*

s/ Christopher Strawn

Christopher Strawn, WSBA No. 32243

12 NORTHWEST IMMIGRANT RIGHTS
PROJECT

13 615 Second Ave., Suite 400

Seattle, WA 98104

14 Phone: (206) 957-8628

Email: chris@nwirp.org

Counsel for Petitioners

17 *I certify that this memorandum contains 218 words,*
18 *in compliance with the Local Civil Rules.*

[PROPOSED] ORDER

The case is dismissed without prejudice, with each party to bear their own fees and costs, pursuant to the following terms:

1. U.S. Department of Homeland Security (“DHS”) shall not re-detain Petitioners until there is an executable final removal order, when the removal period begins under 8 U.S.C. 1231(a)(1), providing Petitioners continue to comply with their current reporting requirements.

2. Respondents shall notify Petitioners and undersigned counsel three business days before taking any enforcement action on violations of reporting requirements.

It is so **ORDERED**.

DATED this _____ day of _____, 2026.

TIFFANY M. CARTWRIGHT
United States District Judge