

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Jianjiang SU, Jose HUERTA-ZUNIGA,
Edgar MEDRANO MENDOZA,
Miguel SAUCEDO-RODRIGUEZ, Alberto
GONZALEZ GOMEZ, Miranda
CONTRERAS-CANTU,

Petitioners,

v.

Julio HERNANDEZ, Seattle Acting Field
Office Director, Enforcement and Removal
Operations, U.S. Immigration and Customs
Enforcement (ICE); UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; Bruce SCOTT,
Warden, Northwest ICE Processing Center,

Respondents.

Case No. 2:26-cv-00765

**PETITION FOR WRIT OF
HABEAS CORPUS**

**INDIVIDUAL
ENFORCEMENT OF
RODRIGUEZ VAZQUEZ
BOND DENIAL CLASS
JUDGMENT**

FACTS

1. Petitioners Jianjiang Su, Jose Huerta-Zuniga, Edgar Medrano Mendoza, Miguel Saucedo-Rodriguez, Alberto Gonzalez Gomez, and Miranda Contreras Cantu bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

2. On September 30, 2025, this Court issued a final judgment “declar[ing] that Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).” *Rodriguez Vazquez v. Bostock*, 802 F. Supp. 3d 1297, 1336 (W.D. Wash. 2025).

3. The Court further declared “that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” *Id.*

Petitioner Jianjiang Su

4. Petitioner Jianjiang Su is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at the Northwest ICE Processing Center (NWIPC) after being taken into custody by U.S. Immigration and Customs Enforcement (ICE) on January 8, 2026, *see* Ex. A, Form I-213;²
- (b) entered the United States without inspection in December 2021 and was not apprehended upon arrival; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

¹ The Bond Denial Class is comprised of “all noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing.” *Rodriguez Vazquez v. Bostock*, 802 F. Supp. 3d 1297, 1336 (W.D. Wash. 2025).

² All exhibit citations are to the authenticating declaration of Leila Kang filed contemporaneously with this petition.

1 5. DHS has placed Mr. Su in removal proceedings pursuant to 8 U.S.C. § 1229a and
2 charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered
3 the United States without inspection. Ex. A, Form I-862.

4 6. On February 3, 2026, an immigration judge (IJ) denied Mr. Su's request for
5 custody determination for lack of jurisdiction. Ex. A, Order of the IJ. No alternative finding
6 regarding flight risk or danger was made. *Id.*

7 **Petitioner Jose Huerta-Zuniga**

8 7. Petitioner Jose Huerta-Zuniga is a member of the Bond Denial Class, as he:

9 (a) does not have lawful status in the United States and is currently detained at
10 NWIPC after being apprehended by DHS on February 12, 2026, *see* Ex. B,
 Form I-213;

11 (b) last entered the United States without inspection in around 2011 and was not
 apprehended upon arrival; and

12 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.
13

14 8. DHS has placed Mr. Huerta-Zuniga in removal proceedings pursuant to 8 U.S.C.
15 § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone
16 who entered the United States without inspection. Ex. B, Form I-862.

17 **Petitioner Edgar Medrano Mendoza**

18 9. Petitioner Edgar Medrano Mendoza is a member of the Bond Denial Class, as he:

19 (a) does not have lawful status in the United States and is currently detained at
20 NWIPC after being apprehended by DHS on February 11, 2026, *see* Ex. C,
 Form I-213;

21 (b) last entered the United States without inspection around 1999, and was not
 apprehended upon arrival; and

22 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.
23

24 10. DHS has placed Mr. Medrano Mendoza in removal proceedings pursuant to
25 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as
26 someone who entered the United States without inspection. Ex. C, Form I-862.
27

Petitioner Miguel Saucedo-Rodriguez

11. Petitioner Miguel Saucedo-Rodriguez is a member of the Bond Denial Class,
as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on January 28, 2026, see Ex. D, Form I-213;
- (b) last entered the United States without inspection around November 2020 and was not apprehended upon arrival; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

12. DHS has placed Mr. Saucedo-Rodriguez in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. D, Form I-862.

Alberto Gonzalez Gomez

13. Petitioner Alberto Gonzalez Gomez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on January 20, 2026, *see* Ex. E, Form I-213;
- (b) last entered the United States without inspection around 1995 and was not apprehended upon arrival, *see id.*; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

14. DHS has placed Mr. Gonzalez Gomez in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. E, Form I-862.

Petitioner Miranda Contreras-Cantu

15. Petitioner Miranda Contreras-Cantu is a member of the Bond Denial Class,
as she:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS in November 2025;
- (b) last entered the United States without inspection on or 2005 and was not apprehended upon arrival; and

(c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

16. Ms. Contreras-Cantu was previously apprehended by DHS in February 2015. Ex. F, Form I-213 (February 2015). That apprehension took place many years after her initial entry into the United States. *See id.*

17. DHS then placed Ms. Contreras-Cantu in removal proceedings pursuant to 8 U.S.C. § 1229a and charged her as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. F, Form I-862.

18. Ms. Contreras-Cantu was subsequently ordered removed, but her removal proceedings were reopened on February 10, 2026, following her detention at NWIPC. Ex. F, Order of the IJ. She is thus currently subject to removal proceedings under the same charge of removability, 8 U.S.C. § 1182(a)(6)(A)(i).

19. The Court should expeditiously grant this petition.

20. For all Petitioners, Respondents are bound by the judgment in *Rodriguez Vazquez* as it has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue to flagrantly defy the judgment in that case and continue to subject Petitioners to unlawful detention despite their clear entitlement to consideration for release on bond as Bond Denial Class members.

21. The Court should accordingly order that within one day, Respondent DHS must release any Petitioner who has received an alternative bond order by an IJ, or allow for those Petitioners’ release upon payment of the alternative bond amount set by the IJ.

22. For any Petitioner without an alternative bond order, the Court should order their release unless Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days of Petitioner’s request.

JURISDICTION & VENUE

23. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the

1 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory
2 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

3 24. Venue is proper in this District because Petitioners are detained at the NWIPC in
4 Tacoma, Washington. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are
5 employees, officers, and agencies of the United States, and a substantial part of the events or
6 omissions giving rise to the claims occurred in this District.

7 **PARTIES**

8 25. Petitioner Jianjiang Su is currently detained at NWIPC. He is a member of the
9 Bond Denial Class certified in *Rodriguez Vazquez*.

10 26. Petitioner Jose Huerta-Zuniga is currently detained at NWIPC. He is a member of
11 the Bond Denial Class certified in *Rodriguez Vazquez*.

12 27. Petitioner Edgar Medrano Mendoza is currently detained at NWIPC. He is a
13 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

14 28. Petitioner Miguel Saucedo-Rodriguez is currently detained at NWIPC. He is a
15 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

16 29. Petitioner Alberto Gonzalez Gomez is currently detained at NWIPC. He is a
17 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

18 30. Petitioner Miranda Contreras-Cantu is currently detained at NWIPC. She is a
19 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

20 31. Respondent Julio Hernandez is the Seattle Acting Field Office Director of ICE's
21 Enforcement and Removal Operation division. As Petitioners' immediate custodian, he is
22 responsible for Petitioners' detention and removal. He is named in his official capacity.

23 32. Respondent United States Department of Homeland Security (DHS) is the federal
24 agency responsible for implementing and enforcing the Immigration and Nationality Act (INA),
25 including the detention and removal of noncitizens.

1 33. Respondent Executive Office for Immigration Review (EOIR) is the federal
2 agency responsible for implementing and enforcing the INA in removal proceedings, including
3 for custody redeterminations in bond hearings.

4 34. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the
5 NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is
6 sued in his official capacity.

7 **CLAIMS FOR RELIEF**

8 **Violation of the INA:**

9 **Request for Relief Pursuant to *Rodriguez Vazquez***

10 35. Petitioners repeat, re-allege, and incorporate by reference each and every
11 allegation in the preceding paragraphs as if fully set forth herein.

12 36. As members of the Bond Denial Class, Petitioners are entitled to consideration for
13 release on bond under 8 U.S.C. § 1226(a).

14 37. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the
15 INA in applying the mandatory detention statute at § 1225(b)(2) to class members.

16 38. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's
17 declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C.
18 § 2201(a).

19 39. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are
20 subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under
21 the INA and this Court's judgment in *Rodriguez Vazquez*.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Petitioners pray that this Court grant the following relief:

- 24 a. Assume jurisdiction over this matter;
- 25 b. Issue a writ of habeas corpus requiring that within one day, Respondents release
26 any Petitioner with an alternative bond order unless Respondents allow for their
27

1 release upon payment of the alternative bond amount and any other conditions set
2 by the IJ;

- 3 c. Issue a writ of habeas corpus as to any Petitioners without an alternative bond
4 order requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a)
5 within fourteen days of a request from Petitioners;
- 6 d. Order that upon Petitioners' release, Respondents must return to Petitioners any
7 personal property, including any personal identification document (other than a
8 passport) and any employment authorization document;
- 9 e. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act
10 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under
11 law; and
- 12 f. Grant any other and further relief that this Court deems just and proper.

13 DATED this 5th day of March, 2026.

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