

The Honorable Tiffany M. Cartwright

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Edwin ULIN VALDEZ, et al.,  
Petitioners,

v.

Julio HERNANDEZ et al.,  
Respondents.

Case No. 2:26-cv-00937-TMC

**PETITIONERS' TRAVERSE**

Respondents offer no defense in this case, acknowledging that all Petitioners are members of the Bond Denial class in *Rodriguez Vazquez v. Bostock*, 802 F. Supp. 3d 1297 (W.D. Wash. 2025). Dkt. 9 at 1, 3. Accordingly, the Court should grant the Petition.

The parties agree that the Court should order Respondents to provide Petitioners with a bond hearing pursuant to 8 U.S.C. § 1226(a). Dkt. 1, Prayer for Relief (c); Dkt. 9 at 3. Petitioners further request that the Court clarify that its order does not prohibit an immigration judge from granting any Petitioner's request for a continuance in their bond proceedings. Dkt. 1, Prayer for Relief (c).

1 Respectfully submitted this 24th day of March, 2026.

2 s/ Aaron Korthuis

3 Aaron Korthuis, WSBA No. 53974  
4 Northwest Immigrant Rights Project  
5 615 Second Ave., Suite 400  
6 Seattle, WA 98104  
7 (206) 816-3872  
8 aaron@nwirp.org

*I certify that the foregoing contains 109 words,  
in compliance with the Local Civil Rules.*

6 *Counsel for Petitioners*