

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

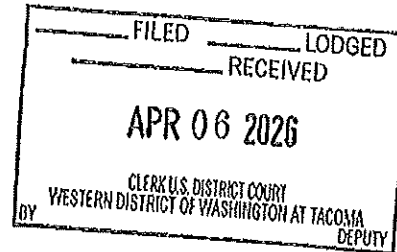
TRONG VU LE (A# ,

Petitioner,

v.

PATRICIA H. HYDE, Field Office Director,
Seattle Field Office, U.S. Immigration and
Customs Enforcement; FACILITY
ADMINISTRATOR, Northwest ICE Processing
Center; ALEJANDRO MAYORKAS, Secretary
of Homeland Security,,
Respondents.

Case No.



**PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER
AND IMMEDIATE RELEASE**

I. INTRODUCTION

Petitioner respectfully moves for a Temporary Restraining Order requiring his immediate release from ICE custody. Petitioner's continued detention is unconstitutional because there is no significant likelihood of removal in the reasonably foreseeable future.

II. LEGAL STANDARD

A Temporary Restraining Order may be granted where the petitioner demonstrates:

1. Likelihood of success on the merits;
2. Irreparable harm;
3. Balance of equities in petitioner's favor;
4. Public interest supports relief.

Winter v. NRDC, 555 U.S. 7 (2008).

III. ARGUMENT

A. Petitioner Is Likely to Succeed on the Merits

Petitioner has been granted withholding of removal under INA § 241(b)(3), and the decision is final.

Because withholding prohibits removal to Vietnam, and ICE has not identified any third country willing to accept Petitioner, removal is not reasonably foreseeable.

Under *Zadvydas v. Davis*, continued detention under these circumstances is unlawful.

B. Petitioner Suffers Irreparable Harm

Continued detention constitutes irreparable harm as a matter of law.

Loss of liberty cannot be remedied after the fact.

C. Balance of Equities Favors Release

Petitioner is not a danger to the community and does not pose a flight risk.

The government has no legitimate interest in detaining an individual who cannot be removed.

D. Public Interest Supports Relief

The public interest is served by ensuring that detention complies with constitutional limits.

IV. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a Temporary Restraining Order requiring Petitioner's immediate release;
2. In the alternative, order an expedited bond hearing;
3. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

Date: 04/01/2026

/s/ Vu Trong Le

Vu Trong Le - Respondent

