

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

E A T-B, an adult,

Petitioner,

v.

DREW BOSTICK, et al.,

Respondents.

No. 2:25-cv-01192-KKE-BAT

REPLY IN SUPPORT OF MOTION
FOR TEMPORARY RESTRAINING
ORDER

Noting Date: August 8, 2025

Oral Argument Requested**Introduction**

E A T-B, an asylum seeker who has never before been incarcerated, has now been in immigration custody for over seven weeks, after filing his habeas petition on the same day as his arrest. The Respondents argue that Petitioner used too many words to support his habeas petition, that he used too few (but maybe referred to too many) in his request for a Temporary Restraining Order (TRO), that he waited too long to request interim relief, but also that the Court should wait to consider his release until the Respondents have filed a third responsive document. Habeas corpus “must retain the ‘ability to cut through barriers of form and procedural mazes,’ because “[t]he very nature of the writ demands that it be administered with the initiative and flexibility essential to insure that miscarriages of justice within its reach are surfaced and corrected.” *Hensley v. Municipal Court, San Jose-Milipitas Judicial Dist.*, 411 U.S. 345, 350 (1973) (quoting *Harris v. Nelson*, 394 U.S. 286, 291 (1969)). The habeas process “demand[s] speed, flexibility, and simplicity.” *Hensley*, 411 U.S. at 350. Courts across the country have acted swiftly this summer to address similar immigration related habeas petitions. *See, e.g.,*

Pablo Sequen v. Kaiser, ---F. Supp. 3d---, 2025 WL 2203419 (N.D. Cal. Aug. 1, 2025) (granting TRO one day after re-arrest for immigrant detained under § 1226 like Petitioner); *see also* Attachment 1 (collecting cases). This Court should follow suit and act now to curb the irreparable harm of E A T-B's unlawful detention.

1. Status of Petitioner's immigration case.

Petitioner is currently scheduled for an individual hearing on August 22, 2025 in Tacoma. Ex. 1 at 1, 4, 16–17. Respondents represented that Petitioner's individual hearing is scheduled for September 8, 2025. ECF 26 at 3. As the attached documents show, on July 16, 2025, the hearing was scheduled for September 8, 2025, but cancelled later that same day. Ex.1 at 13–15. August 22, 2025, remains the current date of the hearing.

Petitioner's immigration attorney requested a continuance of the August 22, 2025, hearing, on grounds that she requires at least 20 hours to meet with the client to prepare for the individual hearing. Her motion details her diligent efforts to schedule virtual visits with her client, the detention center's unresponsiveness to those requests, and the limitations on her ability to prepare for the hearing given the distance of the center from her office and visitation restrictions. *See* Ex. 2 at 3–7. Undersigned counsel understands from speaking with Petitioner's immigration attorney that DHS has until August 11, 2025, to respond to the motion to continue. Petitioner's immigration attorney has a deadline of August 12, 2025, to submit documents for consideration at the August 22, 2025, hearing. Ex. 1 at 8–9.

2. The Respondents responded to the habeas petition and the TRO. The Court may treat the motion as a preliminary injunction or grant ultimate relief on the habeas petition.

A TRO differs from a preliminary injunction in that a TRO may be issued ex parte and without notice to the other party. Although the Respondents had responded to the habeas petition

1 at the time Petitioner moved for a TRO, the Respondents had not been heard on the *Winter*
 2 factors. They have now and the Court can treat the motion as a preliminary injunction. *See, e.g.,*
 3 *Doe v. Becerra*, No. 2:25-cv-00647, 2025 WL 691664, at *3 (E.D. Cal. Mar. 3, 2025)
 4 (Converting motion from temporary restraining order to preliminary injunction because
 5 “Respondents had notice, opportunity to respond, and the ability to be heard.”).

9 Additionally, as explained in Petitioner’s Response to the Motion to Dismiss (ECF 22 at
 7 10–12), the Court should reach the merits of the habeas petition without delay. The Respondents
 8 contend that the revised scheduling order permits a reply. But the habeas statute does not
 9 contemplate a reply (only an amended return), and certainly not under a prolonged briefing
 10 scheduled absent a showing of good cause. 28 U.S.C. § 2243 (“When the writ or order is
 11 returned a day shall be set for hearing, not more than five days after the return unless for good
 12 cause additional time is allowed). As each day extends Petitioner’s unconstitutional and unlawful
 13 custody, and the Respondents have had an opportunity to be heard, the Court should either grant
 14 interim relief, reach the merits of the Petition, or schedule a hearing at which it can take
 15 evidence, hear argument, and expeditiously decide the issues before the Court.

18 **3. The requested relief is not a mandatory injunction, because Petitioner’s release**
 19 **would restore the “status quo ante.” However, even under the mandatory injunction**
 20 **standard, interim relief is warranted.**

21 The Respondents argue that Petitioner seeks a mandatory injunction and thus a more
 22 stringent showing is necessary. However, under either standard, interim relief is necessary. The
 23 difference between a mandatory and prohibitory injunction is that the latter seeks to preserve the
 24 status quo while the former requires a party to take action. *Fellowship of Christian Athletes v.*
 25 *San Jose Unified Sch. Dist. Bd.*, 82 F.4th 664, 684 (9th Cir. 2023) (en banc). However, the
 26

1 relevant status quo is the one “‘before the controversy arose.’” *Id.* (quoting *Ariz. Dream Act*
2 *Coal. v. Brewer*, 757 F.3d 1053, 1060 (9th Cir. 2014)).

3 The recent *Abrego Garcia* case is instructive. In that case, plaintiffs sued over Abrego
4 Garcia’s arrest and removal to Venezuela. The district court entered a preliminary injunction
5 calling for the government “to facilitate and effectuate the return of Plaintiff Kilmar Armando
9 Abrego Garcia to the United States” and that the “preliminary relief is issued to restore the status
7 quo and to preserve Abrego Garcia’s access to due process in accordance with the Constitution
8 and governing immigration statutes.” *Abrego Garcia v. Noem*, No. 8:25-CV-00951, 2025 WL
9 1024654, at *1 (D. Md. Apr. 4, 2025), amended, No. 8:25-CV-00951, 2025 WL 1085601 (D.
10 Md. Apr. 10, 2025). In its opinion supporting that injunction, the district court applied the
11 ordinary preliminary injunction standard, reasoning that mandatory injunctions seek to “alter”
12 the status quo, but “Abrego Garcia requests relief designed to restore the status quo ante . . .
13 [t]hat is, to return him to where he was on March 12, 2025, before he was apprehended by ICE
14 and spirited away to CECOT.” *Abrego Garcia v. Noem*, 777 F. Supp. 3d 501, 516 (D. Md. 2025).
15 Though this order was temporarily stayed, the Supreme Court mostly upheld the order finding
16 that: “The order properly requires the Government to ‘facilitate’ Abrego Garcia’s release from
17 custody in El Salvador and to ensure that his case is handled as it would have been had he not
18 been improperly sent to El Salvador.” *Noem v. Garcia*, 145 S. Ct. 1017, 1018 (2025).
19

20
21 In a case similar to this one, involving the arrest of a previously released non-citizen who
22 sought release by temporary restraining order, the United States District Court for the Eastern
23 District of California discussed the distinction between mandatory and prohibitory injunctions,
24 reasoning that, “[t]he requested relief does not appear to be a mandatory injunction, as it can be
25 understood as merely prohibiting the government from disrupting the status quo ante, which is
26

1 ‘the last, uncontested status which preceded the pending controversy.’” *Singh v. Andrews*, No.
 2 1:25-cv-00801, 2025 WL 1918679, at *13 (E.D. Cal. July 11, 2025) (quoting *Marlyn*
 3 *Nutraceuticals, Inc. v. Mucos Pharma GmbH & Co.*, 571 F.3d 873, 878–79 (9th Cir. 2009)). The
 4 court in *Singh* looked to “similar detention cases” which found “the last uncontested status to be
 5 the moment prior to an unlawful detention.” *Id.* (citing *Pinchi v. Noem*, No. 25-CV-05632, 2025
 6 WL 1853763, at *3 (N.D. Cal. July 4, 2025); *Kuzmenko v. Phillips*, No. 2:25-CV-00663, 2025
 7 WL 779743, at *2 (E.D. Cal. Mar. 10, 2025)). *See also Doe v. Noem*, 778 F. Supp. 3d 1151,
 8 1166 (W.D. Wash. 2025)) (“An interpretation of ‘status quo as the moment before filing a
 9 lawsuit but after alleged misconduct began ‘would lead to absurd situations, in which plaintiffs
 10 could never bring suit once infringing conduct had begun.’”) (quoting *GoTo.com, Inc. v. Walt*
 11 *Disney Co.*, 202 F.3d 1199, 1210 (9th Cir. 2000) (unmatched quotation mark in original)). As the
 12 last uncontested status here was Petitioner’s release on his own recognizance, the Court can
 13 restore him to that position without resort to the mandatory injunction standard.

14
 15 Ultimately though, the court in *Singh* found it unnecessary to determine whether the relief
 16 requested was a mandatory injunction because under either standard, an injunction requiring
 17 release should issue. *See Singh*, 2025 WL 1918679, at *13 (“Nevertheless, the Court will
 18 assume, without deciding, that the relief requested is a mandatory injunction, as it would not
 19 change the result.”). Other courts have taken a similar approach when the result is the same
 20 under either standard. *See Hernandez v. Sessions*, 872 F.3d 976, 999 (9th Cir. 2017) (“Because
 21 the nature of [the requested relief] is subject to [some dispute], we assume without deciding that
 22 the requirement is mandatory.”); *Doe v. Becerra*, No. 2:25-cv-00647, 2025 WL 691664, at *2
 23 (E.D. Cal. Mar. 3, 2025) (Finding it “questionable whether that status quo is properly considered
 24 to be detention when the Government suddenly took an allegedly unconstitutional action in
 25
 26

1 rearresting Petitioner without a hearing,” but declining to reach the issue because the mandatory
 2 injunction “standard is met here.”).

3 As discussed below, because he has made a strong showing on the merits of his claims
 4 and the deprivation of liberty is a grievous, irreparable injury, the Court can find under any
 5 standard, that interim relief is warranted.

9 **4. Petitioner has established irreparable harm warranting interim relief.**

7 The Respondents argue that to warrant injunctive relief, Petitioner must show
 8 “immediate” “extreme or very serious damage” and that the harm is “specific to him.” ECF 26 at
 9 8–9. He has done so. As set forth in the Petitioner’s previous filings, the merits of his claims are
 10 not in doubt. ECF 22 at 20–38. “It is well established that the deprivation of constitutional rights
 11 ‘unquestionably constitutes irreparable injury.’” *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th
 12 Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). And a likelihood of success on a
 13 claim of a constitutional violation “usually demonstrates . . . irreparable harm no matter how
 14 brief the violation.” *Baird v. Bonta*, 81 F.4th 1036, 1040 (9th Cir. 2023). The Respondents’
 15 filings have not convincingly contested Petitioner’s claims of constitutional injury. On the
 16 likelihood of success on the merits, the Respondents largely argued that the TRO motion refers
 17 to another document and possibly exceeded the word count. ECF 26 at 8. The Petitioner’s
 18 reference to his other pleadings was proper, and the Respondents’ failure to engage with the
 19 merits of his claims is telling.¹ The Court should find that Petitioner has established that his re-
 20 detention violates his rights to due process and that alone constitutes irreparable harm.
 21
 22
 23

24 ¹ The TRO motion referenced the simultaneously filed Response to avoid repetition.
 25 Neither the Local Civil Rules nor the Rules of Civil Procedure prohibit parties from referencing
 26 or incorporating arguments in a *motion* as opposed to a pleading. And district courts are not
 limited to the four corners a motion when deciding whether to grant preliminary relief. *See*
Johnson v. Couturier, 572 F.3d 1067, 1083 (9th Cir. 2009) (in deciding a preliminary injunction,

More critically, the Supreme Court held in the context of parolees that the termination of liberty “inflicts a ‘grievous loss’ on the parolee and often on others.” *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972). “Given the civil context, [Petitioner’s] liberty interest is arguably greater than the interest of parolees in *Morrissey*.” *Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. Nov. 19, 2022). The Respondents argue that Petitioner’s harm is insufficient because it is not “specific to him.” ECF 26 at 9. This argument is without merit. *Mata Velasquez v. Kurzdorfer*, No. 25-cv-493, 2025 WL 1953796, at *17 (W.D.N.Y. July 16, 2025) (“But for the government to argue that *anyone*’s detention—let alone someone who has never been incarcerated, who came here in response to an invitation and was promised two years of parole, and who has followed all the rules—does not cause irreparable harm deeply troubles this Court.”). However, Petitioner’s argument is not simply that he is being detained—but rather because he was found suitable for release, he has a liberty interest in his freedom, and that freedom has been revoked without a material change in circumstances or the process necessary to determine whether there was a material change in circumstances. And the cases that Respondents cite, such as *Taha v. Bostock*, No. 25-cv- 649-RSM, 2025 WL 1126681, at *3 (W.D. Wash. Apr. 16, 2025), where there was an order of removal, are in a different posture with different controlling regulations and statutory detention authority.

the district court relied on “the many exhibits, affidavits, declarations and factual allegations which [had] been submitted . . . by all parties . . . throughout the course of th[e] litigation”). Nor did the reference cause the motion to exceed the word requirements. Petitioner’s motion for a TRO contained 1,994 words, and the pages referenced by the TRO from the response (pages 20–36) contained 5,129 words. If Petitioner were to instead have copied and pasted these pages into the TRO motion, the total word count would have been 7,123 words. Including the referenced words, the motion is well within the limit provided by Local Civil Rule 7(e)(3).

1 E A T-B is a young man, who when not detained may “be gainfully employed and is free
 2 to be with family and friends and to form the other enduring attachments of normal life.”
 3 *Morrissey*, 408 U.S. at 482. Further explanation is not necessary, but he can provide it. His father
 4 was killed when he was a child and he fled to the United States in fear for his own life. He is
 5 close to his mother, as shown by his attempt to maintain the family business in Colombia after
 9 she fled, his efforts to be reunited with her and his younger siblings, and their mutual support of
 7 each other in their immigration proceedings. His mother accompanied him to immigration court
 8 and then experienced tremendous fear as their car was followed by masked men, and her son was
 9 arrested without notice or process. Each day he remains in detention injures his mother and his
 10 family. *See Hernandez*, 872 F.3d at 993 (describing the government “power to remove
 12 individuals from their homes [and] separate them from their families” as “devastatingly adverse
 13 action) (citations omitted). Petitioner struggles with the desolation of detention, as he shared in
 14 his declaration: “I try to remain optimistic, but negative feelings keep creeping in and there are
 15 days when I feel very sad.” ECF 23-2 at 3–4. Petitioner’s loss of freedom is necessarily
 16 irreparable—he can never be repaid the weeks he has spent in custody. *See Hernandez*, 872 F.3d
 17 at 999 (citing *Marlyn Nutraceuticals, Inc.*, 571 F.3d at 879) (unlawful detention is not
 18 compensable in damages).
 19

20 Additionally, Petitioner is earnestly pursuing asylum, and after his arrest his individual
 21 hearing was scheduled for August 22, 2025, a timeframe which his immigration counsel
 22 characterizes as “extremely short.” Ex. 2 at 4. Petitioner’s immigration attorney has requested a
 23 continuance, but it has not been granted, and she has experienced great difficulty arranging
 24 confidential communication with Petitioner while he is detained. Ex. 2 at 3–5. That Petitioner’s
 25 detention is interfering with his ability to prepare his case is also irreparable harm. *Domingo v.*
 26

1 *Kaiser*, No. 25-cv-05893, 2025 WL 1940179, at *3 (N.D. Cal. July 14, 2025) (“Additionally,
 2 Petitioner-Plaintiff has an individual merits hearing scheduled for July 15, 2025. If he were to be
 3 transferred out of the district, or not immediately released, his ability to prepare for that hearing,
 4 including by engaging with his counsel, will be impaired.”).

5 **5. The balance of the equities and public interest tips decidedly in Petitioner’s favor.**

6 “[I]t is ‘always in the public interest to prevent the violation of a party’s constitutional
 7 rights.’” *Baird*, 81 F.4th at 1040. The Respondents argue that the public has an interest in
 8 enforcement of its immigration laws and prompt execution of removal orders. However, Petitioner
 9 was released in accordance with regulations and after a finding that he did not pose a risk of flight
 10 or danger to the community. As for his re-detention, “[Respondents] have provided *no indication*
 11 that they complied with the relevant statutory scheme in ‘enforcing immigration laws’ in this case.”
 12 *Doe v. Noem*, 778 F. Supp. 3d at 1166. The disregard for their own regulations is the basis for
 13 Petitioner’s APA and procedural due process claims. ECF 22 at 29–36; *see also Baird*, 81 F.4th
 14 at 1042 (“The government also cannot reasonably assert that it is harmed in any legally cognizable
 15 sense by being enjoined from constitutional violations.”).

16 Additionally, as explained in Petitioner’s Response (ECF 22 at 27), the government only
 17 has an interest in the detention of an immigrant who poses a risk of flight or harm. The Respondents
 18 have still not alleged that Petitioner poses either risk. Their Response states that “ICE determined
 19 that Petitioner would be detained.” ECF 26 at 7. But they do not allege, nor can they, that he was
 20 detained because they determined he posed a risk of flight or danger to the community, nor do they
 21 allege that the determination of his detention was made through a process that comported with due
 22 process.
 23
 24
 25
 26

As one district court explained in a nearly identical case, the balance of harms weighs heavily in Petitioner's favor:

As other courts in this district have concluded under similar circumstances, the potential harm to Ms. Pablo Sequen is significant, while the potential harm to the government is minimal. The only potential injury the government faces is a short delay in detaining Ms. Pablo Sequen if it ultimately demonstrates to a neutral decisionmaker by clear and convincing evidence that her detention is necessary to prevent danger to the community or flight. *See Jorge M. F.*, 2021 WL 783561; *Diaz v. Kaiser*, No. 3:25-CV-05071, 2025 WL 1676854 (N.D. Cal. June 14, 2025). The government "cannot reasonably assert that it is harmed in any legally cognizable sense by being enjoined from constitutional violations." *Zepeda v. U.S. Immigr. & Nat. Serv.*, 753 F.2d 719, 727 (9th Cir. 1983). "Faced with ... a conflict between minimally costly procedures and preventable human suffering, [the Court has] little difficulty concluding that the balance of hardships tips decidedly in plaintiffs' favor." *Singh*, 2025 WL 1918679, at *9 (quoting *Hernandez*, 872 F.3d at 996) (cleaned up).

Pablo Sequen, 2025 WL 2203419, at *3. And while the Respondents argue that Petitioner should use the administrative process to win his release, it is the Respondents that should use their processes if they wish to seek his detention after status quo (his release on recognizance) is restored. *See id.* (collecting cases granting temporary restraining orders and requiring pre-detention hearing before re-detention); ECF 22 at 28–29.

6. Petitioner need not request a post-deprivation bond hearing to demonstrate a violation of his constitutional rights and the APA.

Whether or not Petitioner requested a bond hearing after he was unlawfully and unconstitutionally re-arrested is not relevant to the resolution of the habeas petition or the TRO. In the context of both habeas law and the Administrative Procedures Act, a court looks to an agency's conduct at the time of the deprivation. *See Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 21-23 (2020) (agencies or their lawyers should not be able to "invoke belated justifications" as "convenient litigating positions"); *see also* ECF 23, Ex. 11 at 36 (*OJM v. Bostock, et al.*, No. 3-25-cv-944 at 36 (Oral argument and oral decision, July 14, 2025))

1 (finding that the government “arrested first, they sought to justify later”). Respondents are
 2 required to act in a manner consistent with their regulations, relevant statutes, and the
 3 constitution. Petitioner’s actions after Respondent’s unlawful and arbitrary re-arrest cannot
 4 absolve them of that requirement. *Chipantiza-Sisalema v. Francis*, No. 25-cv-5528, 2025 WL
 5 1927931, *3 (S.D.N.Y. 2025) (rejecting the argument that “any constitutional violation could be
 9 cured if [Petitioner] requested a custody redetermination hearing before an immigration judge.”).

7 Other courts that have addressed the re-arrest or re-detention of immigrants without
 8 process or cause have not required that immigrant detainees seek a bond hearing in order to
 9 receive habeas relief or a TRO. *See Pablo Sequen*, 2025 WL 2203419 (TRO without requiring
 10 that petitioner seek a bond hearing); *OMJ v. Bostock*, No. 3:25-cv-00944-AB (D. Or. July 14,
 11 2025) (granting habeas on due process claim without requirement that petitioner seek a bond
 12 hearing); *Valdez v. Joyce*, 25-cv-04627-GBD, 2025 WL 1707737 (S.D.N.Y. June 18, 2025)
 13 (granting habeas on due process claim without requirement that petitioner seek a bond hearing);
 14 *Domingo v. Kaiser*, No. 5:25-cv-05893-NW, 2025 WL 1940179 (N.D. Cal July 14, 2025) (TRO
 15 without requirement that petitioner seek a bond hearing).
 16
 17

18 Moreover, the Respondents’ position that Petitioner could request and be granted relief
 19 through a bond hearing in front of an immigration judge in Tacoma Immigration Court is
 20 seemingly inconsistent with the current policy and practice of that court. In *Vazquez v. Bostock*,
 21 the plaintiffs documented the fact that “the Tacoma Immigration Court has adopted a unique and
 22 draconian interpretation” of 8 U.S.C. § 1225(b)(2), concluding that any noncitizen who enters
 23 the country without inspection is not entitled to a bond hearing, even if they have been detained
 24 under § 1226. No. 3:25-cv-05240 (W.D. Wash), ECF 3 at 2 (describing how Tacoma
 25 Immigration Court policy is inconsistent with decades of agency practice and law); ECF 29 at 2-
 26

3 (court describing Tacoma Immigration Court policy of unlawfully denying bond across the board for individuals like Petitioner). In fact, *Vazquez* plaintiffs have asked the court to order the Tacoma Immigration Court to provide individual class members with the bond hearings under § 1226, and that the immigration court apply the correct legal standard in those bond hearings. *See id.* at ECF 29 at 36. Even setting aside the unlikelihood that Petitioner would be granted a bond hearing without District Court intervention, the question of whether or not Petitioner has such other avenues to attempt release does not undermine the central issue in his case—Petitioner’s re-arrest and detention by Respondents violates the APA and the Due Process Clause, and this Court is empowered in habeas to right those wrongs.

Conclusion

For the reasons above and in the Motion for TRO, the Court should either reach the merits of the habeas petition or grant the TRO ordering immediate release of Petitioner.

DATED: August 8, 2025.

/s/ Julie Vandiver

Julie Vandiver, AR Bar 2008285

/s/ Jessica Snyder

Jessica Snyder, OR Bar 134911

Attorneys for Petitioner

I certify that this reply including the following attachment contains 4,030 words, in compliance with the Local Civil Rules.

I certify that the Motion for Temporary Restraining Order (ECF 24) contains 1,994 words.

I certify that the Motion for Temporary Restraining Order (ECF 24) combined with the referenced portions of the Response (ECF 22) contains 7,123 words.

ATTACHMENT 1

Case	Date of arrest	Date of relief
<i>Pablo Sequen v. Kaiser</i> , ---F. Supp. 3d---, 2025 WL 2203419 (N.D. Cal. Aug. 1, 2025) (TRO)	July 31, 2025	August 1, 2025
<i>Clavijo v. Kaiser</i> , 2025 WL 2097467 (N.D. Cal July 25, 2025) (TRO)	July 24, 2025	July 25, 2025
<i>Mata Velasquez v. Kurzdorfer</i> , 2025 WL 1953796 (W.D.N.Y. July 16, 2025) (preliminary injunction)	May 21, 2025	July 16, 2025
<i>Garcia v. Andrews</i> , 2025 WL 1927596, at *5-6 (E.D. Cal July 14, 2025) (preliminary injunction)	May 27, 2025 (petition filed on July 3, 2025)	July 14, 2025
<i>Domingo v. Kaiser</i> , No. 5:25-cv-05893-NW, 2025 WL 1940179 (N.D. Cal July 14, 2025) (TRO)	July 14, 2025	July 14, 2025
<i>Azarte v. Andrews</i> , No. 1:25-cv-00942-KES-SKO, 2025 U.S. Dist. LEXIS 149743 (E.D. Cal. Aug. 4, 2025)	July 28, 2025	August 4, 2025
<i>See Benitez v. Francis, et al.</i> , 25-CV-5937 (DEH) (S.D.N.Y. July 28, 2025)	July 18, 2025	July 28, 2025
<i>Martinez v. Hyde</i> , No. 25-cv-11613, 2025 WL 2084238, (D. Mass. July 24, 2025)	July 10, 2025	July 24, 2025
<i>Chipantiza-Sisalema v. Francis</i> , No. 25-cv-5528, 2025 U.S. Dist. LEXIS 132841 (S.D.N.Y. July 13, 2025)	July 3, 2025	July 13, 2025
<i>Valdez v. Joyce</i> , 25-cv-04627-GBD, 2025 WL 1707737 (S.D.N.Y. June 18, 2025).	June 2, 2025	June 18, 2025
<i>YZLH v. Bostock</i> , ---F. Supp. 3d ---, 2025 WL 1898025 (D. Or. July 9, 2025)	June 5, 2025	July 1, 2025
<i>OJM v. Bostock</i> , No. 3:25-cv-00944-AB (D. Or. July 14, 2025)	June 2, 2025	July 14, 2025
<i>Morales Jimenez v. Bostock</i> , No. 3:25-cv-00570-MTK (D. Or. 2025)	April 8, 2025	May 13, 2025

Hearings

This calendar only displays cases for which you have filed a Form EOIR-28. To view additional cases, file a Form EOIR-28 using the "Appearances" link in the header.

Day

Week

Month

Hearing Locations

TACOMA, WA (AIR)

PORTLAND, OR (PA9)

PORTLAND, OR (PO9)

PORTLAND, OR (POR)

SAN ANTONIO, TX (SNA)

August 2025

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

September 2025

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

Hearing(s) Scheduled

August 2025

Previous

Today

Next

Saturday
2
9
16
23
30
1
2
3
4
5
6

Hearing Details

A-Number

IJ Assigned

Reyes, Susana

Hearing Date

08/22/2025

Hearing Location

1623 EAST J STREET, SUITE 3
TACOMA, WA 984211615

Hearing Medium

In-Person

Alien Name

T- B, E A

Hearing Type

Individual

Hearing Time

8:30 AM - 10:00 AM

Riders

Close

[< Back to Cases](#)

A-Number: [REDACTED], T [REDACTED]
E [REDACTED], E [REDACTED] A [REDACTED]

Select a case to view details and file documents

Removal

Charging Doc. Date: 09/07/2023

Case Pending

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Court Information

Case Type:

Removal

Charging Doc. Date:

09/07/2023

Alien Name:

T [REDACTED] - E [REDACTED], E [REDACTED] A [REDACTED]

Hearing Location:

1623 EAST J STREET, SUITE 3
TACOMA, WA 984211615

Immigration Court:

1623 EAST J STREET, SUITE 3
TACOMA, WA 98421

Next Case Hearing:

08/22/2025 08:30 AM - 10:00 AM
INDIVIDUAL HEARING
Reyes, Susana

IJ Decision Date:

-- NA --

This case is pending.

Hearing Medium:

In-Person

Court Actions

eROP Documents

Document Filters

☒ View All ☐ Filter at the Court ☐ Filter at the BIA

Actions	Document Type	Filed Date ▾	Filed At	Filed By	Docur
	Motion for Continuance	08/01/2025	Court	Respondent Rep	Accep
	CASE Notice	07/16/2025	Court	OCIJ	Accep
	CASE Notice	07/16/2025	Court	OCIJ	Accep
	CASE Notice	07/16/2025	Court	OCIJ	Accep
	CASE Notice	07/15/2025	Court	OCIJ	Accep
	Order - Blank Order (BO)	07/15/2025	Court	OCIJ	Accep
	I-213, Record of Deportable / Inadmissible Alien	07/11/2025	Court	DHS	Accep
	CASE Notice	06/27/2025	Court	OCIJ	Accep
	Order - Motion for Change of Venue Grant or Denial (MCVGD)	06/25/2025	Court	OCIJ	Accep
	I-830, Notice to EOIR: Alien Address	06/19/2025	Court	DHS	Accep

Total Count: 28

« Previous 1 2 3 Next »

< [Back to Cases](#)

A-Number: [REDACTED], T [REDACTED] -
B [REDACTED], E [REDACTED] A [REDACTED]

Select a case to view details and file documents

Removal

Charging Doc. Date: 09/07/2023

Case Pending

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Court Information

Case Type:

Removal

Charging Doc. Date:

09/07/2023

Alien Name:

T [REDACTED] - B [REDACTED], E [REDACTED] A [REDACTED]

Hearing Location:

1623 EAST J STREET, SUITE 3
TACOMA, WA 984211615

Immigration Court:

1623 EAST J STREET, SUITE 3
TACOMA, WA 98421

Next Case Hearing:

08/22/2025 08:30 AM - 10:00 AM
INDIVIDUAL HEARING
Reyes, Susana

IJ Decision Date:

-- NA --

This case is pending.

Hearing Medium:

In-Person

Court Actions

eROP Documents

Document Filters

☒ View All ☐ Filter at the Court ☐ Filter at the BIA

Actions	Document Type	Filed Date ▾	Filed At	Filed By	Docur
	I-830, Notice to EOIR: Alien Address	06/19/2025	Court	DHS	Accep
	Motion for Change of Venue	06/18/2025	Court	DHS	Accep
	Reply to Motion	06/18/2025	Court	Respondent Rep	Accep
	Reply to Motion	06/18/2025	Court	Respondent Rep	Accep
	Written Pleadings	06/18/2025	Court	Respondent Rep	Accep
	CASE Notice	06/13/2025	Court	OCIJ	Accep
	Order - Motion Order Generic (MOG)	06/13/2025	Court	OCIJ	Accep
	CASE Notice	06/13/2025	Court	OCIJ	Accep
	EOIR-28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	06/12/2025	Court	Respondent Rep	Accep
	Motion to Consolidate	06/12/2025	Court	Respondent Rep	Accep

Total Count: 28

« [Previous](#) [1](#) [2](#) [3](#) [Next](#) »

[< Back to Cases](#)

A-Number: [REDACTED], T [REDACTED] -
B [REDACTED], E [REDACTED] A [REDACTED]

Select a case to view details and file documents

Removal

Charging Doc. Date: 09/07/2023

Case Pending

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Court Information

Case Type:

Removal

Charging Doc. Date:

09/07/2023

Alien Name:

T [REDACTED] E [REDACTED], E [REDACTED] A [REDACTED]

Hearing Location:

1623 EAST J STREET, SUITE 3
TACOMA, WA 984211615

Immigration Court:

1623 EAST J STREET, SUITE 3
TACOMA, WA 98421

Next Case Hearing:

08/22/2025 08:30 AM - 10:00 AM
INDIVIDUAL HEARING
Reyes, Susana

IJ Decision Date:

-- NA --

This case is pending.

Hearing Medium:

In-Person

Court Actions

eROP Documents

Document Filters

☒ View All ☐ Filter at the Court ☐ Filter at the BIA

Actions	Document Type	Filed Date ▾	Filed At	Filed By	Docur
	Written Pleadings	06/12/2025	Court	Respondent Rep	Accep
	CASE Notice	06/05/2025	Court	OCIJ	Accep
	EOIR-33/IC, Alien's Change of Address Form / Immigration Court	06/05/2025	Court	Respondent	Accep
	I-589, Application for Asylum and for Withholding of Removal	08/20/2024	Court	Respondent	Accep
	CASE Notice	07/10/2024	Court	OCIJ	Accep
	EOIR-33/IC, Alien's Change of Address Form / Immigration Court	03/12/2024	Court	Respondent	Accep
	CASE Notice	03/12/2024	Court	OCIJ	Accep
	I-862 Notice to Appear	02/07/2024	Court	DHS	Accep

Total Count: 28

« Previous 1 2 3 Next »



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
TACOMA IMMIGRATION COURT**

Respondent Name:

T [REDACTED]-B [REDACTED], E [REDACTED]
A [REDACTED]

To:

Martinez, Yessenia Elena
5930 NE 4th Plain Blvd.
#102
Vancouver, WA 98661

A-Number:

[REDACTED]

Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

07/15/2025

ORDER OF THE IMMIGRATION JUDGE

PREHEARING ORDER

This order establishes mandatory page limitations, deadlines, and filing requirements related to your applications for relief under Immigration and Nationality Act § 240(b)(1) and 8 C.F.R. §§ 1003.21(b), 1003.31(c). Noncompliant evidence shall be given no evidentiary weight. See *Taggar v. Holder*, 736 F.3d 886, 889 (9th Cir. 2013). This order does not affect your right to seek a continuance under 8 C.F.R. § 1003.29.

Order:

DEADLINE TO FILE EVIDENCE: All evidence in your case, including a prehearing statement, must be received by the immigration court at least 10 calendar days prior to the date of your individual calendar hearing, as indicated on your court-issued “Notice of Hearing in Removal Proceedings.”

PAGE LIMITATION: You may submit a maximum of 150 pages of country conditions and background evidence. The most recent United States Department of State Human Rights Report and Religious Freedom Report are exempt from this page limitation, but the reports must still be submitted by a party. Country conditions and background evidence must be paginated and include a table of contents that—at a minimum—contains the title of each enclosed document. 8 C.F.R. § 1003.32(b).

A party may request an exception to exceed this order’s 150-page limitation by filing a motion to exceed page limitation at least 30 calendar days prior to the next scheduled individual hearing. The motion must contain a statement establishing “good cause” why an exception should be permitted.

PREHEARING STATEMENT: You must submit a written prehearing statement in accordance with 8 C.F.R. § 1003.21(b) that explains how your evidence tends to prove or disprove a material element of an application for relief. The prehearing statement must list all proposed particular social groups and contain citations to evidence.

CORROBORATIVE EVIDENCE FOR APPLICATIONS FOR ASYLUM, WITHHOLDING

OF REMOVAL, AND PROTECTION UNDER THE CONVENTION AGAINST TORTURE:

To sustain your burden of proof as required by INA §§ 208(b)(1)(B)(ii), 241(b)(3)(C), you must submit the following corroborative evidence if it is mentioned in your Form I-589 or declaration: medical, police, court, religious, or school records; identification or membership cards; and notes (or any other documents) that were left at your residence or place of employment by people who harmed or threatened you. You must also submit signed declarations from family members, friends, and acquaintances who witnessed any harm, threats, or mistreatment you experienced. You must provide copies of all prior Form I-589 applications submitted to the United States government. You must submit this evidence to the court if it is reasonably available. Any foreign language document must be accompanied by an English language translation. 8 C.F.R. § 1003.33. If you cannot obtain corroborative evidence, you will be given an opportunity to explain why at your individual hearing. If you fail to submit corroborative evidence as requested by the court, your application for asylum, withholding of removal, or protection under the Convention Against Torture may be denied for failure to meet your burden of proof, even if you provide credible testimony. See *Ren v. Holder*, 648 F.3d 1079, 1093 (9th Cir. 2011).

CORROBORATIVE EVIDENCE FOR APPLICATIONS FOR CANCELLATION OF REMOVAL OR ADJUSTMENT OF STATUS: You bear the burden of proving that your application for cancellation of removal under INA § 240A or adjustment of status under INA §§ 209 or 245 meets all the eligibility requirements and that you merit the court's favorable exercise of discretion. INA § 240(c)(4)(A). Under INA § 240(c)(4)(B), if you have been arrested, charged, or convicted of a criminal offense in the United States, you are required to submit corroborative evidence including, but not limited to: police reports; affidavits or statements of probable cause; written plea agreements; and criminal judgments. Additionally, if you have undergone a court-ordered alcohol, drug, or chemical dependency examination, you are required to provide the final report. You must submit this evidence to the court if it is reasonably available. If you cannot obtain corroborative evidence, you will be given an opportunity to explain why at your individual hearing. If you fail to submit corroborative evidence requested by the court, your application for discretionary relief may be denied for failure to meet your burden of proof even if you provide credible testimony. See *Ren v. Holder*, 648 F.3d 1079, 1093 (9th Cir. 2011).

BIOMETRICS: Biometrics must be completed prior to an individual hearing. Failure to provide the required biometrics for the applicant and any other covered individual will constitute abandonment of the application, absent good cause for such failure. DHS is responsible for obtaining biometrics for a detained applicant. 8 CFR § 1003.47(c)-(d); *Gonzalez-Veliz v. Garland*, 996 F.3d 942, 948 (9th Cir. 2021).

PROCEDURES FOR INTERNET-BASED HEARINGS: Attorneys and accredited representatives may appear at bond, master calendar, and individual calendar hearings through Webex. To appear through Webex for an individual calendar hearing, Respondent's attorney or accredited representative must file a motion for Webex appearance at least 14 calendar days prior to the hearing, which identifies every witness who will appear through Webex and a proffer of expected testimony. No motion is required to appear via Webex for bond or master calendar hearings.

Attorneys and accredited representatives appearing through Webex must use a computer equipped with a microphone, video camera, and the technical capacity to participate in an uninterrupted four-hour hearing. Attorneys and accredited representatives are strongly

encouraged to wear headphones during Webex hearings to help eliminate audio feedback, which can degrade the quality of the court's audio recording.

If an immigration judge grants a motion for Webex appearance, the attorney or accredited representative should use the link below that corresponds to the immigration judge assigned to the respondent's case. Once an attorney or accredited representative has joined the meeting via the link and the immigration judge has granted entrance to the meeting, the attorney will have the capability to see and hear the other hearing participants.

Judge Scala: <https://eoir.webex.com/meet/ACIJ.Scala>

Judge Odell: <https://eoir.webex.com/meet/IJ.Odell>

Judge Fitting: <https://eoir.webex.com/meet/IJ.Fitting>

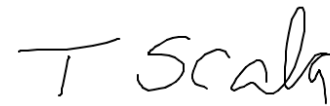
Judge Floyd: <https://eoir.webex.com/meet/IJ.Floyd>

Judge Reyes: <https://eoir.webex.com/meet/IJ.Reyes>

Attachments:

☐ EOIR 33 ☐ EOIR 28 ☐ Legal Services List ☐ FTD Advisal ☐ Other:

☐ VD Advisal ☐ EOIR-26 APPEAL PACKET ☒ Frivolous Application Warning



Immigration Judge: Scala, Theresa 07/15/2025

Appeal: Department of Homeland Security: ☐ waived ☐ reserved
Respondent: ☐ waived ☐ reserved

Appeal Due:

Certificate of Service

This document was served:

Via: ☐ M Mail | ☐ P Personal Service | ☐ E Electronic Service | ☐ U Address Unavailable

To: ☐ Noncitizen | ☐ Noncitizen c/o custodial officer | ☐ E Noncitizen's atty/rep. | ☐ E DHS

Respondent Name : T [REDACTED] -B [REDACTED], E [REDACTED] A [REDACTED] | A-Number : [REDACTED]

Riders:

Date: 07/15/2025 By: Kendra L., Court Staff

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
TACOMA IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Jul 15, 2025

TO: Law Office of Yessenia Martinez
Martinez, Yessenia Elena
5930 NE 4th Plain Blvd.
#102
Vancouver, WA 98661

RE: [REDACTED] T [REDACTED] -B [REDACTED], E [REDACTED] A [REDACTED]

Notice of In-Person Hearing

Your case has been scheduled for a INDIVIDUAL hearing before the immigration court on:

Date: Aug 22, 2025
Time: 08:30 A.M. PT
Court Address: 1623 EAST J STREET, SUITE 3, TACOMA, WA 98421

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by [completing the enclosed paper form](#) and mailing it to the immigration court listed above.

Internet-Based Hearings: If you are scheduled to have an internet-based hearing, you will appear by video or telephone. If you prefer to appear in person at the immigration court named above, you must file a motion for an in-person hearing with the immigration court at least fifteen days before the hearing date provided above. Additional information about internet-based hearings for each immigration court is available on EOIR's website at <https://www.justice.gov/eoir/eoir-immigration-court-listing>.

In-Person Hearings: If you are scheduled to have an in-person hearing, you will appear in person at the immigration court named above. If you prefer to appear remotely, you must file a motion for an internet-based hearing with the immigration court at least fifteen days before the hearing date provided above.

For information about your case, please call **1-800-898-7180** (toll-free) or **304-625-2050**.

The Certificate of Service on this document allows the immigration court to record delivery of this notice to you and to the Department of Homeland Security.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL[M] PERSONAL SERVICE[P] ELECTRONIC SERVICE[E]
 TO: [] Noncitizen | [] Noncitizen c/o Custodial Officer |
 [E] Noncitizen ATT/REP | [E] DHS
 DATE: 7/15/25 BY: COURT STAFF kll
 Attachments: [] EOIR-33 [] Appeal Packet [X] PREHEARING ORDER [] Other NH



Use a smartphone's camera to scan the code on this page to read the notice online.

Usa la cámara de un teléfono inteligente para escanear el código de esta página y leer el aviso en línea.

Use a câmara do smartphone para digitalizar o código nesta página e ler o manual de instruções online.

使用智能手机摄像头扫描本页面的代码，即可在线阅读该通知。

ਠੇਠਿਸ ਤੂੰ ਅੰਨਲਾਈਨ ਪੜ੍ਹਨ ਲਈ ਇਸ ਪੰਨੇ 'ਤੇ ਕੋਡ ਤੂੰ ਸਕੈਨ ਕਰਨ ਲਈ ਸਮਾਰਟਫੋਨ ਦੇ ਕੈਮਰੇ ਦੀ ਵਰਤੋਂ ਕਰੋ।

অনলাইনে নোটিশ পড়ার জন্য এই পজেরে কোডটি স্ক্যান করতে স্মার্টফোনের ক্যামেরা ব্যবহার করুন

सूचना अनलाइनमा पढ्न यस पृष्ठमा कोड स्क्यान गर्न स्मार्टफोनको क्यामेरा प्रयोग गर्नुहोस्।

Sèvi ak kamera yon telefòn entèlijian pou eskane kòd ki nan paj sa a pou li avè a sou entènèt.

استخدم كاميرا الهاتف الذكي لمسح الرمز الموجود في هذه الصفحة لقراءة الإشعار على الإنترنت

Чтобы прочитатъ уведомление онлайн, отсканируйте код на этой странице с помощью камеры вашего смартфона.

Utilisez l'appareil photo d'un téléphone intelligent pour scanner le code sur cette page afin de lire l'avis en ligne.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
TACOMA IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Jul 16, 2025

TO: Law Office of Yessenia Martinez
Martinez, Yessenia Elena
5930 NE 4th Plain Blvd.
#102
Vancouver, WA 98661

RE: [REDACTED] T [REDACTED] -E [REDACTED], E [REDACTED] A [REDACTED]

Notice of In-Person Hearing

Your case has been scheduled for a **INDIVIDUAL hearing** before the immigration court on:

Your hearing date has changed. Please disregard any previous hearing notice and appear for your hearing at the date, time and location found on this hearing notice.

Date: Sep 8, 2025
Time: 1:00 P.M. PT
Court Address: 1623 EAST J STREET, SUITE 3, TACOMA, WA 98421

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by

[completing the enclosed paper form](#) and mailing it to the immigration court listed above.

Internet-Based Hearings: If you are scheduled to have an internet-based hearing, you will appear by video or telephone. If you prefer to appear in person at the immigration court named above, you must file a motion for an in-person hearing with the immigration court at least fifteen days before the hearing date provided above. Additional information about internet-based hearings for each immigration court is available on EOIR's website at <https://www.justice.gov/eoir/eoir-immigration-court-listing>.

In-Person Hearings: If you are scheduled to have an in-person hearing, you will appear in person at the immigration court named above. If you prefer to appear remotely, you must file a motion for an internet-based hearing with the immigration court at least fifteen days before the hearing date provided above.

For information about your case, please call **1-800-898-7180** (toll-free) or **304-625-2050**.

The Certificate of Service on this document allows the immigration court to record delivery of this notice to you and to the Department of Homeland Security.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL[M] PERSONAL SERVICE[P] ELECTRONIC SERVICE[E]
TO: [] Noncitizen | [] Noncitizen c/o Custodial Officer |
[E] Noncitizen ATT/REP | [E] DHS
DATE: 07/16/2025 BY: COURT STAFF SBD
Attachments: [] EOIR-33 [] Appeal Packet [] Legal Services List [] Other NH

Use a smartphone's camera to scan the code on this page to read the notice online.

Usa la cámara de un teléfono inteligente para escanear el código de esta página y leer el aviso en línea.

Use a câmara do smartphone para digitalizar o código nesta página e ler o manual de instruções online.

使用智能手机摄像头扫描本页面的代码，即可在线阅读该通知。

ਠੇਠਿਸ ਟੂ ਅੰਨਲਾਈਨ ਪੜ੍ਹਨ ਲਈ ਇਸ ਪੇਜ 'ਤੇ ਕੋਡ ਟੂ ਸਕੈਨ ਕਰਨ ਲਈ ਸਮਾਰਟਫੋਨ ਦੇ ਕੈਮਰੇ ਦੀ ਵਰਤੋਂ ਕਰੋ।

অনলাইনে নোটিশ পড়ার জন্য এই পজেরে কোডটি স্ক্যান করতে স্মার্টফোনের ক্যামেরা ব্যবহার করুন



सूचना अनलाइनमा पढ्न यस पृष्ठमा कोड स्क्यान गर्न स्मार्टफोनको क्यामेरा प्रयोग गर्नुहोस्।

Sèvi ak kamera yon telefòn entèlijian pou eskane kòd ki nan paj sa a pou li avè a sou entènèt.

استخدم كاميرا الهاتف الذكي لمسح الرمز الموجود في هذه الصفحة لقراءة الإشعار على الإنترنت

Чтобы прочитатъ уведомление онлайн, отсканируйте код на этой странице с помощью камеры вашего смартфона.

Utilisez l'appareil photo d'un téléphone intelligent pour scanner le code sur cette page afin de lire l'avis en ligne.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
TACOMA, WA

Law Office of Yessenia Martinez
Martinez, Yessenia Elena
5930 NE 4th Plain Blvd.
#102
Vancouver, WA 98661

FILE NO. A [REDACTED] DATE: Jul 16, 2025
RESPONDENT(S) A [REDACTED] T [REDACTED] -E [REDACTED], E [REDACTED] A [REDACTED]

NOTICE OF CANCELLATION OF IMMIGRATION HEARING

RE: T [REDACTED] -E [REDACTED], E [REDACTED] A [REDACTED]

PLEASE TAKE NOTICE THAT THE ABOVE CAPTIONED CASE SCHEDULED
FOR A HEARING BEFORE AN IMMIGRATION JUDGE ON
Sep 8, 2025, AT 1:00 P.M. HAS BEEN CANCELLED. YOU WILL RECEIVE
NOTICE OF THE NEW DATE AND TIME OF THE HEARING FROM:

THE IMMIGRATION COURT
1623 EAST J STREET, SUITE 3
TACOMA, WA 98421

IF YOU ARE THE ATTORNEY/REPRESENTATIVE OF RECORD, IT IS YOUR
RESPONSIBILITY TO ADVISE YOUR CLIENT OF THIS INFORMATION
AND TO ASSURE HIS/HER APPEARANCE WHEN THE NEW NOTICE IS
ISSUED.

IF YOU ARE THE RESPONDENT/APPLICANT YOU ARE REQUIRED TO
APPEAR AT THE DATE, TIME AND ADDRESS INDICATED IN THE NEW
NOTICE.

FOR INFORMATION REGARDING THE STATUS OF YOUR CASE, CALL TOLL FREE
1-800-898-7180 or 304-625-2050.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL ☐ PERSONAL SERVICE ☐ ELECTRONIC SERVICE ☐
TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS
DATE: 07/16/2025 BY: COURT STAFF sbd
Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
TACOMA IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Jul 16, 2025

TO: Law Office of Yessenia Martinez
Martinez, Yessenia Elena
5930 NE 4th Plain Blvd.
#102
Vancouver, WA 98661

RE: [REDACTED] T [REDACTED] -E [REDACTED], E [REDACTED] A [REDACTED]

Notice of In-Person Hearing

Your case has been scheduled for a **INDIVIDUAL hearing** before the immigration court on:

Date: Aug 22, 2025
Time: 08:30 A.M. PT
Court Address: 1623 EAST J STREET, SUITE 3, TACOMA, WA 98421

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by [completing the enclosed paper form](#) and mailing it to the immigration court listed above.

Internet-Based Hearings: If you are scheduled to have an internet-based hearing, you will appear by video or telephone. If you prefer to appear in person at the immigration court named above, you must file a motion for an in-person hearing with the immigration court at least fifteen days before the hearing date provided above. Additional information about internet-based hearings for each immigration court is available on EOIR's website at <https://www.justice.gov/eoir/eoir-immigration-court-listing>.

In-Person Hearings: If you are scheduled to have an in-person hearing, you will appear in person at the immigration court named above. If you prefer to appear remotely, you must file a motion for an internet-based hearing with the immigration court at least fifteen days before the hearing date provided above.

For information about your case, please call **1-800-898-7180** (toll-free) or **304-625-2050**.

The Certificate of Service on this document allows the immigration court to record delivery of this notice to you and to the Department of Homeland Security.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL[M] PERSONAL SERVICE[P] ELECTRONIC SERVICE[E]
 TO: [] Noncitizen | [] Noncitizen c/o Custodial Officer |
 [E] Noncitizen ATT/REP | [E] DHS
 DATE: 07/16/2025 BY: COURT STAFF SBD
 Attachments: [] EOIR-33 [] Appeal Packet [] Legal Services List [] Other NH

Use a smartphone's camera to scan the code on this page to read the notice online.

Usa la cámara de un teléfono inteligente para escanear el código de esta página y leer el aviso en línea.

Use a câmara do smartphone para digitalizar o código nesta página e ler o manual de instruções online.

使用智能手机摄像头扫描本页面的代码，即可在线阅读该通知。

ਠੇਠਿਸ ਠੂੰ ਅੰਨਲਾਈਨ ਪੜ੍ਹਨ ਲਈ ਇਸ ਪੰਨੇ 'ਤੇ ਕੋਡ ਠੂੰ ਸਕੈਨ ਕਰਨ ਲਈ ਸਮਾਰਟਫੋਨ ਦੇ ਕੈਮਰੇ ਦੀ ਵਰਤੋਂ ਕਰੋ।

অনলাইনে নোটিশ পড়ার জন্য এই পজেরে কোডটি স্ক্যান করতে স্মার্টফোনের ক্যামেরা ব্যবহার করুন



सूचना अनलाइनमा पढ्न यस पृष्ठमा कोड स्क्यान गर्न स्मार्टफोनको क्यामेरा प्रयोग गर्नुहोस्।

Sèvi ak kamera yon telefòn entèlijian pou eskane kòd ki nan paj sa a pou li avè a sou entènèt.

استخدم كاميرا الهاتف الذكي لمسح الرمز الموجود في هذه الصفحة لقراءة الإشعار على الإنترنت

Чтобы прочесть уведомление онлайн, отсканируйте код на этой странице с помощью камеры вашего смартфона.

Utilisez l'appareil photo d'un téléphone intelligent pour scanner le code sur cette page afin de lire l'avis en ligne.

Yessenia Elena Martinez
Law Office of Yessenia Martinez
5930 NE 4th Plain Blvd. #102
Vancouver, Washington 98661
Tel.: (360) 635-6900
Fax.: (360) 799-4670

NON-DETAINED

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PORTLAND, OREGON**

In the Matter of:

T [REDACTED] B [REDACTED], E [REDACTED] r A [REDACTED],

Respondents.

A [REDACTED]

IJ: Susana Reyes
ICH: August 22, 2025
Time: 8:30am

RESPONDENT'S MOTION TO CONTINUE

TABLE OF CONTENTS

	Page
1. Motion to Continue.....	4 – 5
2. Emails to the Northwest Detention Center Requesting A Virtual Appointment.....	6 - 11
3. NWDC Instructions for Virtual Attorney Appointments.....	12 – 21
4. Certificate of Service.....	22

RESPONDENT'S MOTION TO CONTINUE

Undersigned counsel requests a continuance for attorney preparation. This is Counsel's first time representing a respondent in removal proceedings while respondent is in detention. Counsel is a solo practitioner in Vancouver, Washington. Counsel began representation of Respondent on June 12, 2025 to appear with Respondent for his June 18, 2025 hearing. Counsel opposed the Department's motion to terminate and requested that Respondent's case be consolidated with his family members' cases. Respondent was detained on June 18, 2025 minutes after leaving his master calendar hearing. Counsel was instructed to go to the Portland ICE field office where she could have access to Respondent. Within minutes Counsel went to the Portland ICE field office and requested to meet with her client. The officers she spoke with lied to her and stated that no one had been detained that day or brought to the detention center. Counsel was denied access to Respondent, despite being taken to the Portland ICE detention center. Counsel checked the ICE detainee locator which identified to call the local field office for information about Respondent and did not provide further information. The next day on June 19, 2025, Counsel called checked the online ICE detainee locator and the location from Respondent was updated to reflect that he was being detained in Tacoma at the Northwest Detention Center NWDC. Counsel called the Northwest Detention Center and was provided the email nwipcattorney@geogroup.com to schedule a virtual attorney appointment. Counsel has sent several emails and placed several calls trying to schedule a virtual attorney visit. Counsel has been told that the scheduler is out on vacation or unavailable and to send an email and the scheduler will respond. Counsel has not received an emails in response to her requests nor any communication of what the NWDC needs from Counsel to schedule the virtual appointment. As a solo-practitioner Counsel is unable to drive to Tacoma and wait hours for the opportunity to speak with Respondent just for an hour visit as

she has several other clients and court hearings in Portland Immigration Court that also require her attention and in office attendance.

As Counsel only began representation of Respondent, 7 days prior to his detention, she was not able to fully interview and prepare Respondent for a merits hearing. Counsel has been denied access to Respondent since being detained first at the Portland ICE field office and now through lack of response by the Northwest Detention Center when Counsel has tried to schedule virtual appointments with Respondent. Counsel is requesting a continuance because of the Northwest Detention Center's continued denial to provide Counsel with virtual attorney meetings. Counsel cannot prepare for the merits hearing without access to her client. Counsel anticipates needing at least 20 hours to speak with Respondent in a confidential setting. From the Northwest Detention Center's online instructions, attorneys are only provided 1 hour time increments to meet with their clients per day via in person or on a virtual non-recorded line. Counsel would have to drive up to Tacoma a minimum of 20 days to complete the preparation she needs and this is not feasible for a solo attorney, when counsel has only been provided 37 days from the master calendar hearing to the individual hearing and all supporting evidence needs to be provided 10 calendar days prior to the ICH no later than August 12, 2025. Additionally when the ICH was scheduled on June 16, 2025, Counsel understood the date that was being scheduled as a master calendar hearing not an individual hearing, and once Counsel received the notice and the pre-hearing order Counsel realized the extremely short timeframe to prepare for the merits hearing.

Counsel cannot be driving up to Tacoma for 20 days to get 1 hour of communication time with Respondent per day. Counsel's office is 2 hours from the detention center. Counsel would have to drive 4 hours total and be in the detention center for hours waiting to meet with her client just for 1 hour. Counsel would have to drive to the detention center everyday up until the date for

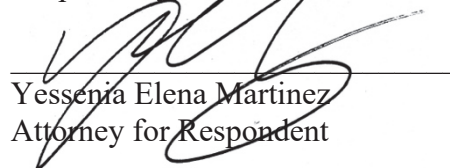
the hearing and potentially spend the entire workday away and dropping all other obligations and responsibilities of her other existing clients and for the Portland Immigration Court just because the NWDC is failing to respond to requests for virtual attorney appointments on a non-recorded line. Respondent has been detained for almost 2 month and the Northwest Detention Center has not provided Counsel with an unmonitored virtual attorney appointment despite requests for the appointment to be scheduled. To date Counsel has not been scheduled a virtual appointment despite several calls to the center requesting a virtual appointment. There is good cause for the merits hearing to be continued to allow for attorney preparation because of NWDC continued oversight and denial to allow Counsel to meet with Respondent virtually.

Counsel requests a continuance for December 2025, January 2026, February 2026, or March 2026. If Counsel has to drive up to Tacoma to meet with her client in person for the anticipated at least 20 hours she will need to speak with him, Counsel needs time in months to do so. Counsel only has 12 days to submit the entire evidence submission, prehearing statement, and general case which is not enough time for Counsel to present the case when she is being denied access to Respondent. Counsel's dates of unavailability during these months are December 15, 2025; December 16, 2025; January 22, 2025; January 27, 2025; and February 9, 2026.

Counsel respectfully requests this court for a continuance to allow for attorney preparation.

Dated: August 1, 2025

Respectfully Submitted,



Yessenia Elena Martinez
Attorney for Respondent

From: Yessenia Martinez attorney@ym-immigration.com 
Subject: Re: Scheduling an Attorney Appointment
Date: August 1, 2025 at 4:49 PM
To: nwipcattorney@geogroup.com

Good afternoon,

I still have not received a response and need to speak with my client E [REDACTED] R [REDACTED] T [REDACTED] E [REDACTED] A2 [REDACTED]. I have been requesting this visitation since June 19, 2025, for a month and a half. I provided alternative dates and times. I need several visits scheduled with him. He is scheduled his trial/individual hearing for August 22, 2025. I am proposing dates of Monday August 4, 2025, from 7am to 3pm I have availability. I am available all day on Tuesday August 5, 2025. And I am available on Wednesday August 6, 2025 from 12pm until the last appointment that can be scheduled. I have called the NWDC and have not been able to speak with the scheduler and have been directed to send an email which I have done so on numerous occasions. I have not received any communication regarding the virtual attorney appointment and need to be able to speak with my client as I have not been able to visit the detention center. My direct number is 7 [REDACTED] - [REDACTED]. Thank you.

Yessenia Martinez
Law Office of Yessenia Martinez
5930 NE 4th Plain Blvd.
Suite 102
Vancouver, Washington 98661
T: (360) 635-6900
F: (360) 799-4670
www.ym-immigration.com

NOTICE: California licensed, practice limited to federal immigration law in states other than California. The information contained in this e-mail is attorney privileged and confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly forbidden. If you have received this communication in error, please immediately notify us by telephone at (360) 635-6900.

On Jul 29, 2025, at 8:36 AM, Yessenia Martinez <attorney@ym-immigration.com> wrote:

Good afternoon,

I have been waiting to get an appointment scheduled or get an email response back from my inquiry and I have not received any response yet. I am again emailing to get an attorney virtual appointment scheduled for me to meet with my client E [REDACTED] A [REDACTED] T [REDACTED] E [REDACTED] A [REDACTED]. I am looking to get an appointment scheduled as soon as possible. Either tomorrow, Tuesday July 29, 2025 at 11:00am, or 3pm, Wednesday July 30, 2025 at 4pm, or Friday August 1st at 2pm. I need a 1 hour appointment. I would like to schedule multiple 1 hour appointments. He has been scheduled a hearing for August 22, 2025 and I have not received any response to my emails. I need to speak with my client on a non-recorded confidential line.

Yessenia Elena Martinez
Law Office of Yessenia Martinez
5930 NE 4th Plain Blvd.
Suite 102
Vancouver, Washington 98661
T: (360) 635-6900
F: (360) 799-4670
www.ym-immigration.com

NOTICE: California licensed, practice limited to federal immigration law in states other than California. The information contained in this e-mail is attorney privileged and confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly forbidden. If you have received this communication in error, please immediately notify us by telephone at (360) 635-6900.

On Jul 15, 2025, at 9:10 AM, Yessenia Martinez <attorney@ym-immigration.com> wrote:

Good morning,

I have been waiting for almost a month to get a virtual attorney appointment scheduled. I understand that the scheduler has been out on vacation, but I need to be able to speak with my client on a non-recorded non-monitored line. I again am requesting an appointment be scheduled for me to speak with Mr. E [REDACTED] A [REDACTED] T [REDACTED] E [REDACTED] A [REDACTED]. Please let me know what you need from me in order to get this scheduled. Thank you.

Sincerely,

Yessenia Martinez
Law Office of Yessenia Martinez
5930 NE 4th Plain Blvd.
Suite 102
Vancouver, Washington 98661
T: (360) 635-6900
F: (360) 799-4670
www.ym-immigration.com

NOTICE: California licensed, practice limited to federal immigration law in states other than California. The information contained in

this e-mail is attorney privileged and confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly forbidden. If you have received this communication in error, please immediately notify us by telephone at (360) 635-6900.

On Jun 19, 2025, at 3:17 PM, Yessenia Martinez <attorney@ym-immigration.com> wrote:

Good afternoon,

I represent Mr. E [REDACTED] A [REDACTED] T [REDACTED] Beltran A [REDACTED]. I would like to schedule an appointment to speak with him electronically. Please let me know what you need from me in order to get this scheduled. I am the attorney of record with EOIR. Thank you.

Sincerely,

Yessenia Martinez
Law Office of Yessenia Martinez
5930 NE 4th Plain Blvd.
Suite 102
Vancouver, Washington 98661
T: (360) 635-6900
F: (360) 799-4670
www.ym-immigration.com

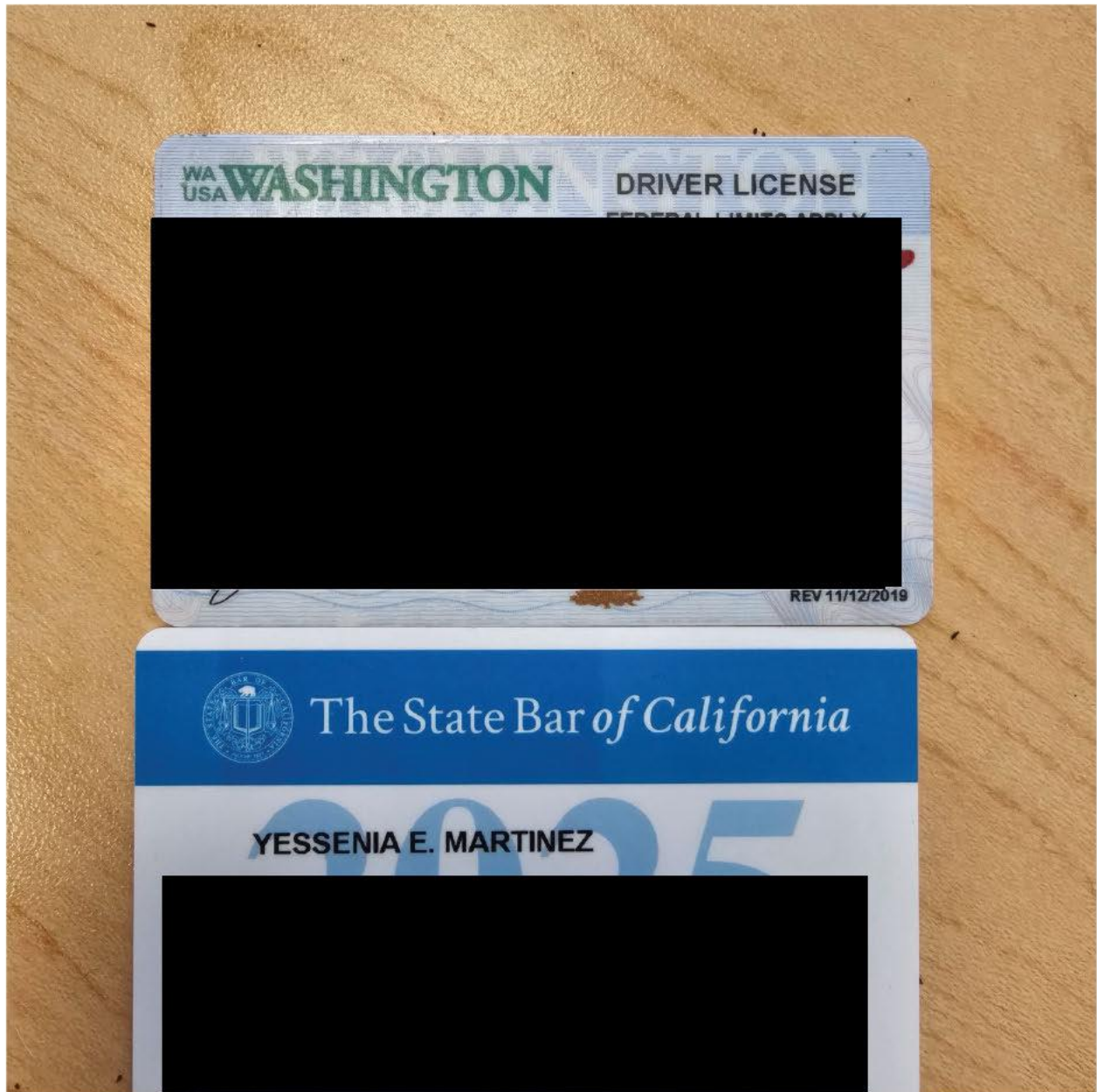
NOTICE: California licensed, practice limited to federal immigration law in states other than California. The information contained in this e-mail is attorney privileged and confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly forbidden. If you have received this communication in error, please immediately notify us by telephone at (360) 635-6900.

E [REDACTED] A [REDACTED] T [REDACTED] B [REDACTED]
[REDACTED].pdf



Attorney Yessenia Elena Martinez
ID and Bar Card.pdf
883 KB





U.S. Department of Justice

OMB#1125-0006

Executive Office for Immigration Review

Notice of Entry of Appearance as Attorney or
Representative Before the Immigration Court

Immigration Court

(Type or Print) NAME AND ADDRESS OF REPRESENTED PARTY E [REDACTED] A [REDACTED] T [REDACTED] B [REDACTED] (First) (Middle Initial) (Last) [REDACTED] (Number and Street) (Apt. No.) Vancouver WA [REDACTED] (City) (State) (Zip Code)	ALIEN ("A") NUMBER (Provide A-number of the party represented in this case.) A [REDACTED] Entry of appearance for (please check <u>one</u> of the following): ☒ All proceedings ☐ Custody and bond proceedings only ☐ All proceedings other than custody and bond proceedings
--	---

Attorney or Representative (please check one of the following):

☒ I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following states(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia (use additional space on reverse side if necessary) and I am not subject to any order disbaring, suspending, enjoining, restraining or otherwise restricting me in the practice of law in any jurisdiction (if subject to such an order, do not check this box and explain on reverse).

Full Name of Court California Bar Number (if applicable) 302208

☐ I am a representative accredited to appear before the Executive Office for Immigration Review as defined in 8 C.F.R. § 1292.1(a)(4) with the following recognized organization:

☐ I am a law student or law graduate of an accredited U.S. law school as defined in 8 C.F.R. § 1292.1(a)(2).

☐ I am a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3).

☐ I am an accredited foreign government official, as defined in 8 C.F.R. § 1291.1(a)(5), from _____ (country).

☐ I am a person who was authorized to practice on December 23, 1952, under 8 C.F.R. § 1292.1(b).

Attorney or Representative (please check one of the following):

☒ I hereby enter my appearance as attorney or representative for, and at the request of, the party named above.

☐ EOIR has ordered the provision of a Qualified Representative for the party named above and I appear in that capacity.

I have read and understand the statements provided on the reverse side of this form that set forth the regulations and conditions governing appearances and representations before the Immigration Court. By signing this form, I consent to publication of my name and any findings of misconduct by EOIR, should I become subject to any public discipline by EOIR pursuant to the rules and procedures at 8 C.F.R. 1003.101 *et seq.* I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

SIGNATURE OF ATTORNEY OR REPRESENTATIVE	EOIR ID NUMBER	DATE
X //s//, YESSENIA MARTINEZ	[REDACTED]	06/12/2025

NAME OF ATTORNEY OR REPRESENTATIVE, ADDRESS, FAX & PHONE NUMBERS, & EMAIL ADDRESS

Name: Yessenia E Martinez

(First) (Middle Initial) (Last)

Address: 5930 NE 4th Plain Blvd. #102

(Number and Street)

Vancouver WA 98661

(City) (State) (Zip Code)

Telephone: 360-635-6900 Facsimile: 360-799-4670 Email: attorney@ym-immigration.com

☐ Check here if new address

Indicate Type of Appearance:
☒ Primary Attorney/Representative ☐ Non-Primary Attorney/Representative

☐ On behalf of _____ (Attorney's Name) for the following hearing: _____ (Date)

 I am providing pro bono representation. Check one: ☐ yes ☒ no
Proof of Service
 I (Name) Yessenia Martinez mailed, emailed or delivered a copy of this Form EOIR-28 on (Date) _____ to the DHS (U.S. Immigration and Customs Enforcement – ICE) at _____

☒ No service needed. I electronically filed this document, and the opposing party is participating in ECAS.

X //s//, YESSANIA MARTINEZ on 06/12/2025 07:02:38 PM

Signature of Person Serving

APPEARANCES - An attorney or Accredited Representative (with full accreditation) must register with the EOIR eRegistry in order to practice before the Immigration Court (see 8 C.F.R. § 1292.1(f)). Registration must be completed online on the EOIR website at www.justice.gov/eoir. An appearance shall be filed on a Form EOIR-28 by the attorney or representative appearing in each case before an Immigration Judge (see 8 C.F.R. § 1003.17). A Form EOIR-28 shall be filed either as an electronic form, or as a paper form, as appropriate (for further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at www.justice.gov/eoir). The attorney or representative must check the box indicating whether the entry of appearance is for custody and bond proceedings only, for all proceedings other than custody and bond, or for all proceedings including custody and bond. When an appearance is made by a person acting in a representative capacity, his/her personal appearance or signature constitutes a representation that, under the provisions of 8 C.F.R. part 1003, he/she is authorized and qualified to represent individuals and will comply with the EOIR Rules of Professional Conduct in 8 C.F.R. § 1003.102. Thereafter, substitution or withdrawal may be permitted upon the approval of the Immigration Judge of a request by the attorney or representative of record in accordance with 8 C.F.R. § 1003.17(b). Please note that although separate appearances in custody and non-custody proceedings are permitted, appearances for limited purposes within those proceedings are not permitted. See *Matter of Velasquez*, 19 I&N Dec. 377, 384 (BIA 1986). A separate appearance form (Form EOIR-27) must be filed with an appeal to the Board of Immigration Appeals (see 8 C.F.R. § 1003.38(g)). Attorneys and Accredited Representatives (with full accreditation) must first update their address in eRegistry before filing a Form EOIR-28 that reflects a new address.

FREEDOM OF INFORMATION ACT - This form may not be used to request records under the Freedom of Information Act or the Privacy Act. The manner of requesting such records is in 28 C.F.R. §§ 16.1-16.11 and appendices. For further information about requesting records from EOIR under the Freedom of Information Act, see How to File a Freedom of Information Act (FOIA) Request With the Executive Office for Immigration Review, available on EOIR's website at <http://www.justice.gov/eoir>.

PRIVACY ACT NOTICE - The information requested on this form is authorized by 8 U.S.C. §§ 1229(a), 1362 and 8 C.F.R. § 1003.17 in order to enter an appearance to represent a party before the Immigration Court. The information you provide is mandatory and required to enter an appearance. Failure to provide the requested information will result in an inability to represent a party or receive notice of actions in a proceeding. EOIR may share this information with others in accordance with approved routine uses described in EOIR's system of records notice, EOIR-001, Records and Management Information System, 69 Fed. Reg. 26,179 (May 11, 2004), or its successors and EOIR-003, Practitioner Complaint-Disciplinary Files, 64 Fed. Reg. 49237 (September 1999). Furthermore, the submission of this form acknowledges that an attorney or representative will be subject to the disciplinary rules and procedures at 8 C.F.R. 1003.101*et seq.*, including, pursuant to 8 C.F.R. §§ 292.3(h)(3), 1003.108(c), publication of the name of the attorney or representative and findings of misconduct should the attorney or representative be subject to any public discipline by EOIR.

CASES BEFORE EOIR - Automated information about cases before EOIR is available by calling (800) 898-7180 or (240) 314-1500.

FURTHER INFORMATION - For further information, please see the *Immigration Court Practice Manual*, which is available on the EOIR website at www.justice.gov/eoir.

ADDITIONAL INFORMATION:

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is six (6) minutes. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

Additional Attorney Court Information

Full Name of Court

Bar Number (if applicable)

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Population (millions)	7.5	7.6	7.7	7.8	7.9	8.0	8.1	8.2	8.3	8.4	8.5	8.6	8.7	8.8	8.9	9.0	9.1	9.2	9.3	9.4	9.5
GDP (trillion USD)	50.0	52.0	54.0	56.0	58.0	60.0	62.0	64.0	66.0	68.0	70.0	72.0	74.0	76.0	78.0	80.0	82.0	84.0	86.0	88.0	90.0
Life expectancy (years)	75.0	75.5	76.0	76.5	77.0	77.5	78.0	78.5	79.0	79.5	80.0	80.5	81.0	81.5	82.0	82.5	83.0	83.5	84.0	84.5	85.0
Urban population (%)	55.0	56.0	57.0	58.0	59.0	60.0	61.0	62.0	63.0	64.0	65.0	66.0	67.0	68.0	69.0	70.0	71.0	72.0	73.0	74.0	75.0
Renewable energy (%)	10.0	11.0	12.0	13.0	14.0	15.0	16.0	17.0	18.0	19.0	20.0	21.0	22.0	23.0	24.0	25.0	26.0	27.0	28.0	29.0	30.0
CO2 emissions (Gt)	15.0	16.0	17.0	18.0	19.0	20.0	21.0	22.0	23.0	24.0	25.0	26.0	27.0	28.0	29.0	30.0	31.0	32.0	33.0	34.0	35.0
Forest cover (%)	22.0	22.5	23.0	23.5	24.0	24.5	25.0	25.5	26.0	26.5	27.0	27.5	28.0	28.5	29.0	29.5	30.0	30.5	31.0	31.5	32.0
Healthcare expenditure (%)	8.0	8.5	9.0	9.5	10.0	10.5	11.0	11.5	12.0	12.5	13.0	13.5	14.0	14.5	15.0	15.5	16.0	16.5	17.0	17.5	18.0
Internet usage (%)	40.0	45.0	50.0	55.0	60.0	65.0	70.0	75.0	80.0	85.0	90.0	95.0	98.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Gender inequality index	0.65	0.66	0.67	0.68	0.69	0.70	0.71	0.72	0.73	0.74	0.75	0.76	0.77	0.78	0.79	0.80	0.81	0.82	0.83	0.84	0.85
Human Development Index	0.70	0.71	0.72	0.73	0.74	0.75	0.76	0.77	0.78	0.79	0.80	0.81	0.82	0.83	0.84	0.85	0.86	0.87	0.88	0.89	0.90



ERO | CPD

Virtual
Attorney
Visitation

VAV^{at} Tacoma ICE Processing Center (Northwest)



Overview

U.S. Immigrations and Customs Enforcement (ICE) detention standards require that noncitizens in ICE facilities be allowed confidential contact with legal representatives. In an effort to facilitate improved access to legal representatives, ICE has implemented VAV in various detention facilities nationwide. VAV, which facilitates confidential attorney-client conversations through virtual technology (Zoom), does not substitute for in-person meetings with clients, but it does provide a timely and efficient communication alternative.

Procedures for virtual legal visits at Tacoma ICE Processing Center:

- As with in-person legal visitation:
 - The legal representative will be required to show appropriate identification, such as a bar card from any state or other available documentation demonstrating bar membership, prior to the scheduled meeting.
 - Only legal representatives, legal assistants, and interpreters will be allowed; no family or friends of the clients are permitted.
 - The legal representative may contact outside interpretation services during the call or session.
- A visitation officer will be stationed outside of the confidential room to maintain and ensure the safety and security for all detained non-citizens utilizing VAV.
- Video-visitation may be used for other confidential interviews (by USCIS or forensic medical evaluators) or other special visitation purposes (child welfare), contingent upon availability.



Please be advised that legal representatives and their staff are not permitted to video or audio record during any virtual or in-person visit or any call with non-citizens at the facility. Any violation of these rules may result in suspension or a permanent revocation of VAV user privileges.

For information on VAV available hours and scheduling, please see:
<https://www.ice.gov/detain/detention-facilities/northwest-ice-processing-center-nwipc>

For additional questions about VAV or to schedule a video visit at Tacoma please contact:



Nwipcattorney@geogroup.com

 An official website of the United States government

 [En Español](#)

 [Contact Us](#)

 [Quick Links](#)



Official websites use .gov

A **.gov** website belongs to an official government organization in the United States.



Secure .gov websites use HTTPS

A **lock** () or **https://** means you've safely connected to the .gov website. Share sensitive information only on official, secure websites.



U.S. Immigration
and Customs
Enforcement



Call **1-866-DHS-2-ICE** to report suspicious activity

[ICE](#)  [DETAIN](#)  [DETENTION FACILITIES](#)

Northwest ICE Processing Center (NWIPC) Office

Contacting
a Detainee

Legal &
Case
Information

Hours of
Visitation

Sending
Items to
Detainees

Press
&
Media

FOIA

Friends and Family Visits

Visitation is open 7 days a week including federal holidays. (Visitation will occur on holidays

regardless of the day the holiday falls on.) Visitors must follow all masking, social distance g and COVID-19 screening requirements.

You may check-in 15 minutes prior to the scheduled time for each unit. If you arrive after the check-in times for a particular unit, if time allows, you may still visit, however you may not r your full hour.

Visitors must be checked-in timely for each unit visit period, to allow for enough time to pro hour's visit. Sessions will be no less than one hour under normal conditions. In unforeseen circumstances, such as the number of visitors exceeding visiting room capacity, facility may visiting periods. Visit periods may be limited to help all signed-up visitors get enough time t

During the pandemic, each unit will have a specific visit time slot available, two times each listed below. Units on quarantine will not be permitted to visit. If you are not sure, you may i facility to ask before traveling.

COVID-19 Community Level	Visitation Limit
Low	4 visitors, Twice a week
Medium	2 visitors, Twice a week
High	1 visitor, Once a week

Detainee Classification	Visitation Times
A-1	Monday 7 a.m. to 8:30 a.m. Thursday 2:30 p.m. to 4 p.m.
A-2	Monday 8:30 a.m. to 10 a.m. Thursday 6 p.m. to 7:30 p.m.
A-3	Monday 1 p.m. to 2:30 p.m. Thursday 7:30 p.m. to 9 p.m.
B-1	Friday 7 a.m. to 8:30 a.m. Monday 2:30 p.m. to 4 p.m.

B-2	Friday 8:30 a.m. to 10 a.m. Monday 6 p.m. to 7:30 p.m.
B-3	Friday 1 p.m. to 2:30 p.m. Monday 7:30 p.m. to 9 p.m.
C-1	Tuesday 7 a.m. to 8:30 a.m. Friday 2:30 p.m. to 4 p.m.
C-2	Tuesday 8:30 a.m. to 10 a.m. Friday 6 p.m. to 7:30 p.m.
C-3	Tuesday 1 p.m. to 2:30 p.m. Friday 7:30 p.m. to 9 p.m.
D-1	Saturday 7 a.m. to 8:30 a.m. Tuesday 2:30 p.m. to 4 p.m. .
D-2	Saturday 8:30 a.m. to 10 a.m. Tuesday 6 p.m. to 7:30 p.m.
D-3	Saturday 1 p.m. to 2:30 p.m. Tuesday 7:30 p.m. to 9 p.m.
F-1	Wednesday 7 a.m. to 8:30 a.m. Saturday 2:30 p.m. to 4 p.m.
F-2	Wednesday 8:30 a.m. to 10 a.m. Saturday 6 p.m. to 7:30 p.m.
F-3	Wednesday 1 p.m. to 2:30 p.m. Saturday 7:30 p.m. to 9 p.m.
F-4	Sunday 7 a.m. to 8:30 a.m. Wednesday 2:30 p.m. to 4 p.m.
G-1	Sunday 8:30 a.m. to 10 a.m.

	Wednesday 6 p.m. to 7:30 p.m.
G-2	Sunday 1 p.m. to 2:30 p.m. Wednesday 7:30 p.m. to 9 p.m.
G-3	Thursday 7 a.m. to 8:30 a.m. Sunday 2:30 p.m. to 4 p.m.
G-4	Thursday 8:30 a.m. to 10 a.m. Sunday 6 p.m. to 7:30 p.m.
H-1	Thursday 1 p.m. to 2:30 p.m. Monday 7:30 p.m. to 9 p.m.

Visitation Rules

- Visitors must show appropriate picture identification to enter the facility.
- A maximum of two adults and two children may visit at any one time.
- If your visitor(s) bring children (17 years of age or younger) they are expected to maintain supervision of those children and prevent disruption to other visitors. Any disruptive behavior by either party will result in the termination of the visit and may cause future visits to be denied.
- Visitors are not permitted to carry personal items into the visiting area. Lockers are provided to secure these items.
- No coats, jackets, vests, sweaters or sweatshirts that have pockets and or hoods. Seasonal outerwear and overcoats shall be placed in the lockers.
- Visitors will be limited to one session per day unless time and scheduling permit additional visits.
- Visitors must be in appropriate and socially accepted attire.
- Visitors may use the kiosk at the Front Entrance to place U.S. currency into a detainee's account.

Dress Code for Visitors

- **Female Visitors (Age 12 and Older)**
 - Shorts shall cover customarily covered areas of the anatomy, including the buttock and crotch area, both when standing and sitting. Shorts no higher than mid-thigh length.

Short shorts, jogging shorts, cut-offs, and other obviously inappropriate short g are prohibited.

- Skirts and dresses shall extend to mid-thigh, seated.
- Slits in skirts and dresses shall rise no higher than mid-thigh, seated.
- Sheer (see-through) clothing is prohibited. The top of clothing shall not be lower armpit in the front or back. Bare midriffs, tank tops, strapless tops, tube tops, and swimsuits are prohibited.
- Shoes shall be worn at all times. Gang "colors" and other gang displays are prohibited.
- No clothing with offensive pictures or writing.

- **Male Visitors (Age 12 and Older)**

- Shorts shall cover customarily covered areas of the anatomy, including the butt crotch area, both when standing and sitting. Shorts no higher than mid-thigh are prohibited. Short shorts, jogging shorts, cut-offs, and other obviously inappropriate short g are prohibited.
- Shirts shall be worn at all times. Muscle shirts, bare midriff shirts and sleeveless are prohibited.
- Shoes shall be worn at all times.
- Gang "colors" and other gang displays are prohibited.

Attorney Visits

Legal representatives of detainees are authorized to visit their clients during the following hours:

7 a.m. – 9:30 p.m.

Including weekends and holidays

A list of pro bono (free) legal organizations will be posted in all detainee housing units and common areas. This list shall be updated quarterly. If a detainee wishes to see a representative or paralegal from that organization, it is the detainee's responsibility to contact them for an appointment.

Please note that attorneys are permitted to bring in electronic devices such as: laptops, cell phones, tablets, iPads, etc. to visitation or court. An authorization form will need to be filled out when bringing an electronic device, which is available at the Front Desk.

Video Teleconferencing | Virtual Attorney Visits

Legal representatives may request virtual legal visits with their clients or prospective clients at Nwipcattorney@geogroup.com.

A staff officer at Northwest ICE Processing Center will email back with a confirmed date and Please see the [flyer](#) for details.

The email should include:

- Legal representative's full name
- Legal representative's contact information, including phone number(s), and email address
- Detainee's name
- Detainee's alien number
- At least three proposed dates and times for the requested VAV meeting
- A scan of the legal representative's government issued identification
- A scan of the legal representative's identification or documentation reflecting their status as an active legal representative, such as a state bar card, attorney license, paralegal license or similar legal status.
- A scan of the attorney's DHS Form G-28 (unless this is a pre-representational)
- If a legal assistant is the only legal representative to join the call, the email should also include a letter of authorization on the firm's/organization's letterhead and a scan of the assistant's identification.

All appointments for virtual legal visits should be made 24 hours prior to the desired appointment time to ensure that the facility receives the request in time. Appointments are scheduled daily from 9 a.m. to 8 p.m. (PST). Virtual legal visits will be in 30-60 minute increments. All appointments are contingent on availability. Please note that legal representatives are not limited on the number of virtual legal appointments they can request, but no legal representative is permitted more than one 60-minute appointment with a detainee in a single day.

The same guidelines for in-person attorney/client visits will apply to virtual legal visits and legal assistant visits. Only legal representatives, legal assistants, and interpreters will be allowed; no family or friends of the clients are permitted. The attorney and/or his/her agents may contact outside interpreter services during the call or session. The sessions will be confidential; a visitation officer will be stationed outside of the confidential room to ensure security by standing out of earshot but within eyeshot. The officer will knock 5 minutes before the cut off time.

Any violation of these rules may result in the immediate termination of the VAV meeting.

the suspension or revocation of the attorney's or authorized representative's VAV priv

Consular Visits

Consular officials may meet with their detained nationals at any time. It is requested that pr arrangements be made with the ICE Supervisory Deportation Officer to the extent possible, consular officials bring appropriate credentials when they come to the facility. The ICE Supe Deportation Officer in charge of the facility can be reached at (253) 779-6000.

Clergy Visits

The Tacoma Northwest Detention Center provides detainee religious services/programs five week.

Visiting Restrictions

- All family or other social visits are non-contact.
- No firearms or weapons of any kind are permitted in the facility.
- If visitors are or appear to be intoxicated, visitation will not be allowed.
- All visitors are subject to search while in the facility.
- Visitors are not allowed to pass or attempt to pass any items to detainees.
- Visitors are not allowed to carry any items into the visitation area.

Search Procedures (prior to or during all visitat

All individuals requesting admittance to the facility or the visitation area are subject to a pat search of their person, an inspection of their belongings, and a metal scan search. Individua refusing to cooperate with a reasonable search will not be admitted. No firearms or weapon kind are permitted. No electronic devices (cell phones, pagers, radios, etc.) are permitted in secure areas of this facility.

Updated: 02/10/2025

ADDRESS CONTACT INFORMATION

1623 E J

Street,

Suite 2

Tacoma,

WA

98421-

1615

United

States

Facility Main Phone:
(253) 779-6000

Field Office Main
Phone: (206) 835-
0650

 [See
Map](#)

ACCESS INFORMATION

 **Parking:** Parking is available on J Street immediately in front of the facility.

 **Accessibility for Individuals with Special Needs:** The facility does not discriminate based on disability and provides detainees with disability-related accommodations, as needed, to access its programs and activities.

[About Us](#)

[Immigration Enforcement](#)

[Combating Transnational Crime](#)

[Newsroom](#)



**U.S. Immigration
and Customs
Enforcement**



[ICE Contact Center](#)

Report suspicious activity: 1-866-DHS-2-ICE



ICE.gov

An official website of the U.S. Department of Homeland Security.

National Terrorism Advisory System

[About ICE](#)

[Accessibility](#)

[FOIA Requests](#)

[Privacy Policy](#)

[DHS.gov](#)

[Archive](#)

[No FEAR Act Data](#)

[Site Links](#)

[Performance Reports](#)

[Inspector General](#)

[The White House](#)

[DHS Components](#)

[USA.gov](#)

CERTIFICATE OF SERVICE

This document was electronically filed through ECAS on the 1st of August 2025 and both parties are participating in ECAS. Therefore, no separate service was completed.

A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, positioned above a horizontal line.