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Catholic Community Services of Lane County

Attorneys for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Eugene Division**

M-S-L, an adult,

Petitioner,

v.

DREW BOSTOCK, Seattle Field Office
Director, Immigration and Customs
Enforcement and Removal Operations
("ICE/ERO"); TODD LYONS, Acting
Director of Immigration Customs
Enforcement ("ICE"); U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT; KRISTI
NOEM, Secretary of the Department of
Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND
SECURITY; and PAMELA BONDI, Attorney
General of the United States,

Respondents.

Case No. 6:25-cv-01204-AA

Agency No. A- XXX-XXX 

**MOTION TO TRANSFER
PETITIONER TO THE OREGON
DISTRICT, OR RESTRAIN
RESPONDENT FROM
TRANSFERRING PETITIONER
FROM TACOMA FACILITY**

**MOTION TO TRANSFER PETITIONER TO THE OREGON DISTRICT, OR
RESTRAIN RESPONDENT FROM TRANSFERRING PETITIONER FROM TACOMA
FACILITY**

1. M-S-L (“Petitioner”) is a transgender woman from Mexico who fled Mexico because she experienced severe emotional and physical harm due to her gender identity. Petitioner suffered such emotional distress that it caused serious mental health symptoms that made it difficult to live. Petitioner suffered beatings in her home country because of her gender identity.
2. Petitioner was released by Respondents on her own recognizance from immigration custody on/around February 25, 2024, nearly one year and nine months ago. Petitioner applied for asylum before the U.S. immigration authorities on February 18, 2025.
3. On information and belief, since entering in February 25, 2024, Petitioner has complied with every request, demand, and requirement by Respondents, in addition to complying with all legal timelines for their asylum case.
4. Respondent advised Petitioner’s counsel that she has been removed from Oregon on July 10, 2025, at 4:30 pm PST, after the Habeas Corpus petition had been filed with the court, and Petitioner was lodged in Respondents’ Tacoma, Washington detention facility.
5. Any transfer of the Petitioner away from the Tacoma facility would likely be farther from the Oregon District, farther from Petitioner’s attorneys (hindering her right to counsel), and farther from her community.

**MOTION TO TRANSFER PETITIONER TO THE OREGON DISTRICT, OR
RESTRAIN RESPONDENT FROM TRANSFERRING PETITIONER FROM TACOMA
FACILITY**

6. Petitioner, therefore, requests the court to order Respondents to transfer Petitioner back to the Oregon District, or at the minimum, to not transfer Petitioner away from the Tacoma detention facility.

Dated: July 11, 2025.

/s/ Rob Easton

Rob Easton, OSB # 203697

Attorney for Petitioner

**MOTION TO TRANSFER PETITIONER TO THE OREGON DISTRICT, OR
RESTRAIN RESPONDENT FROM TRANSFERRING PETITIONER FROM TACOMA
FACILITY**