

District Judge Robert S. Lasnik
Magistrate Judge Grady J. Leupold

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LIEN NGOC DO,

Petitioner,

v.

BRUCE SCOTT, *et al.*,

Respondents.

Case No. 2:25-cv-02187-RSL-GJL

STIPULATION REGARDING
THIRD COUNTRY REMOVAL
AND FACILITY TRANSFER

Petitioner Lien Ngoc Do has filed a habeas corpus petition challenging her detention at the Northwest ICE Processing Center. Dkt. 1. In that petition, she seeks an order preventing her removal to a country other than Vietnam. *Id.* at 6. The Parties have met and conferred on whether U.S. Immigration and Customs Enforcement (“ICE”) Enforcement and Removal Operations (“ERO”) will agree not to remove Petitioner to a third country or transfer her to another immigration facility away from her counsel and family while this litigation is pending. ICE ERO is not seeking to effectuate Petitioner's removal to a third country and agrees not to transfer her to another facility while this litigation is pending. Therefore, ICE ERO agrees not to remove Petitioner to any other country than Vietnam or transfer her to another immigration detention facility while this litigation is pending.

STIPULATION REGARDING THIRD COUNTRY
REMOVAL AND FACILITY TRANSFER
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Further, The Parties have conferred and agreed to an expedited briefing schedule as follows: Respondent's return is due by November 19, 2025, and Petitioner's response is due by November 21, 2025.

Dated this 7th day of November, 2025.

Respectfully submitted,

CHARLES NEIL FLOYD
United States Attorney

SEATTLE CLEMENCY PROJECT

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UW LAW IMMIGRATION CLINIC

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/s/ Georgina Olazcon Mozo

I certify that this memorandum contains 170 words in compliance with the Local Rules.

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Counsel for Petitioner

[PROPOSED ORDER]

For so long as this case remains pending, ICE ERO shall not remove Petitioner Lien Ngoc Do to another country other than Vietnam or transfer her from the Northwest Immigration Processing Center to another immigration facility.

Further, per the agreement of the Parties, Respondent's return is due by November 19, 2025, and Petitioner's response is due by November 21, 2025.

It is so ORDERED.

DATED this ____ day of _____, 2025.

ROBERT S. LASNIK
United States District Judge