

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLIAM PANTOJA,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; CAMMILLA
WAMSLEY, Seattle Field Office
Director, United States Citizenship and
Immigration Services; BRUCE SCOTT,
Warden of Immigration Detention
Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No. CV25-2440-JLR

STIPULATED MOTION
PROHIBITING TRANSFER OR
REMOVAL DURING PENDENCY OF
PROCEEDINGS AND
WITHDRAWING PETITIONER'S
MOTION FOR TEMPORARY
RESTRAINING ORDER

Note on Motion Calendar:
December 19, 2025

On December 2, 2025, Petitioner William Pantoja, a Cuban national, filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241.

On December 17, 2025, Federal Respondents provided notice of removal to Mexico within 48 hours.

On December 18, 2025, Petitioner filed a motion for a temporary restraining order to prevent removal to Mexico while the habeas corpus petition is being litigated.

On December 18, 2025, this Court provisionally granted the temporary restraining order to the extent that Petitioner not be transferred or removed during the

1 pendency of the TRO motion with instructions for the parties to meet and confer about
2 briefing schedules for the pending temporary restraining order motion.

3 On December 19, 2025, the parties conferred and have agreed to the following:

4 ■ Federal Respondents represent through this writing, and affirm with
5 counsel's signature below, that Federal Respondents will NOT remove or
6 transfer Petitioner William Pantoja while his § 2241 habeas corpus petition is
7 pending before this Court.

8 ■ With this representation from Federal Respondents, Petitioner agrees that the
9 motion for a temporary restraining order is now MOOT insofar as Federal
10 Respondents have provided Petitioner a guarantee that he will not be
11 removed nor transferred while this Court considers his habeas corpus
12 petition.

13 Accordingly, Petitioner William Pantoja, through counsel, withdraws the motion
14 for a temporary restraining order.

15
16 DATED this 19th day of December 2025.

17 Respectfully submitted,

18 *s/ Jesse Cantor*
19 Assistant Federal Public Defender
20 Attorney for William Pantoja

21 *s/ Michelle Lambert*
22 Assistant United States Attorney
23 Attorney for Federal Respondents

24 I certify this motion complies with the page limits specified in LCR 7(e)(3).
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