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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 VELA Blanco, Noe,
12 A# 

13 Petitioner,

14 vs.

15 Warden, Northwest ICE Processing Center;
16 U.S. Immigration and Customs Enforcement
17 (ICE); Alejandro Mayorkas, Secretary of the
18 Department of Homeland Security,

19 Respondents.

CIVIL ACTION NO. 25-6097

EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER

20 Petitioner, by and through undersigned counsel, respectfully moves this Court for the
21 issuance of a Temporary Restraining Order enjoining Respondents from transferring him from
22 the Northwest ICE Processing Center.

23 Petitioner was detained on November 22, 2025, and is currently housed in Tacoma,
24 Washington. He has a Master Calendar Hearing scheduled for December 17, 2025. Petitioner's
25 family resides in Washington, and his counsel is located in Washington. Counsel was recently
26 retained and filed a bond request today.

27 ICE has indicated that it intends to transfer Petitioner immediately. Such a transfer would
28 severely impair Petitioner's ability to consult with counsel, prepare evidence, coordinate
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER - 1

1 witnesses, manage medical care for diabetes, and meaningfully participate in his upcoming
2 immigration court proceedings.

3 Petitioner is likely to succeed on the merits of his habeas petition, faces immediate and
4 irreparable harm if transferred, and the balance of equities and public interest strongly favor
5 maintaining the status quo.
6

7 Petitioner therefore respectfully requests that the Court issue a Temporary Restraining
8 Order preventing his transfer pending resolution of his habeas proceedings.
9

10 Respectfully submitted this 5th day of December 2025.
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12
13 /s/Vicky J Currie

14 _____
15 Vicky J Currie, WSBA #24192
16 Attorney for Petitioners
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CERTIFICATE OF SERVICE

I, Vicky J Currie, certify that on this 5th day of December, 2025, I served true and correct copies of the **EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**, together with all supporting exhibits, to be served upon the following Respondents by **United States mail** and/or **electronic service** as permitted:

Warden

Northwest ICE Processing Center
1623 East J Street
Tacoma, WA 98421

U.S. Immigration and Customs Enforcement (ICE)

Office of the Principal Legal Advisor (OPLA)
Seattle Field Office
500 12th Street, SW
Suite 200
Washington, DC 20536

Alejandro Mayorkas

Secretary, U.S. Department of Homeland Security
U.S. Department of Homeland Security
245 Murray Lane, SW
Washington, DC 20528

U.S. Attorney – Western District of Washington

700 Stewart Street
Suite 5220
Seattle, WA 98101

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 5th day of December 2025.

/s/Vicky J Currie

Vicky J Currie, WSBA #24192
Attorney for Petitioners