

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CARL TODD,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States, *et al.*,

Respondents.

) No. CV25-02519-JHC

) EMERGENCY MOTION FOR ORDER
) PREVENTING TRANSFER DURING
) PENDENCY OF PETITION

) Note on Motion Calendar:
) January 2, 2026

Petitioner Carl Todd formally requests that he not be transferred out of this jurisdiction while the petition is pending “[b]ecause transfer of Petitioner to another district could interfere with his access to counsel and ability to participate in the proceedings,” *Tran v. Bondi, et al.*, No. CV25-1897-JLR-BAT, Dkt. 6 at 3 (W.D. Wash. Oct. 7, 2025) (sua sponte issuing such an order in a § 2241 case involving an ICE detainee). *See* Petition, Dkt. 1 at 1–2.

On December 10, 2025, Petitioner filed a § 2241 habeas petition. The Court quickly ordered that he be given 48 hours before any transfer. Dkt. 6. On December 11, the U.S. Attorney’s Office informed him that he would be transferred Monday, after the required notice period, to an unknown location in order to facilitate his removal to Jamaica.

1 The U.S. Attorney's Office was unable to provide a copy of travel documents or
2 any proof that Jamaica had accepted him after decades of refusing to recognize him as a
3 citizen.

4 In order to facilitate this Court's jurisdiction over the pending petition and to
5 allow Mr. Todd opportunity to speak to the Jamaican consulate and ensure that the U.S.
6 Attorney's Office's assertions are correct, Petitioner requests that he not be transferred
7 out of this jurisdiction while his petition is pending.

8 The Office of the Federal Public Defender has conferred with the U.S.
9 Attorney's Office about the above requests. Respondents have indicated that the U.S.
10 Attorney's Office will wait to respond until the motion is filed.

11 DATED this 12th day of December 2025.

12 Respectfully submitted,

13 s/ *Ann K. Wagner*
14 Assistant Federal Public Defender
15 Attorney for Carl Todd

16 I certify this motion contains 251 words in compliance with the Local Civil Rules.
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