

UNITED STATES DISTRICT COURT

IN AND FOR THE WESTERN DISTRICT OF WASHINGTON

José Sanchez-Alfonso

Petitioner

vs.

Pamela Bondi, U.S. Attorney
General; Kristi Noem, Secretary
of DHS; Camilla Wamsley,
Seattle ICE Field Office
Director; Bruce Scott,
Warden of N.W. De Cal;

Respondents

Case No.:

Motion For
Temporary
Restraining
Order

FILED	LODGED
RECEIVED	
DEC 29 2025	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

*Pursuant to Hamberson v. Bondi, 2025 U.S. Dist. Lexis 229603, at *10-12 (2025); and Baltodano v. Bondi, 2025 U.S. Dist. Lexis 250760, at *16-30 (2025); aforesaid petitioner hereby moves this Court for and Order granting a TRO, preventing Respondents from removing him to a third country during pendency of this habeas litigation;

And/or permanently, given that he will likely win on the merits.

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TRO

1-2

• As ruled herein, this administration's current third-country-removal policy is procedurally and substantively preposterous to the Federal Due Process Clause; given that:

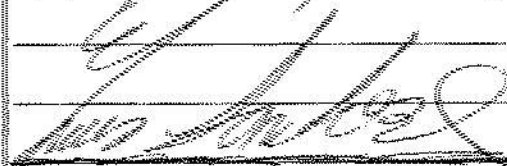
(a) it fails to provide immigrants with notice and meaningful opportunity to legally contest such deportations; and

(b) said policy is unconstitutionally punitive and tantamount to harshness and imprisonment.

• Wherefore, petitioner prays this Court grant the aforementioned.

• Dated this 22nd of December 2025.

• Respectfully submitted,



Luis Sanchez-Affonso
Pro Se Petitioner