

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DORIS ELIZABETH MORAN,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; LAURA
HERMOSILLO, Acting 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.

**MOTION FOR APPOINTMENT OF
COUNSEL**

Petitioner Doris Moran requests that the Court appoint the Office of the Federal Public Defender for the Western District of Washington, or such other counsel as the Court may deem appropriate, to represent her in this matter. Petitioner does not have the financial resources to retain counsel as she is presently in custody. For this reason, and because the present petition presents novel and complex issues of law, appointment of counsel would serve the interests of justice. Many other ICE detainees are or will be raising similar habeas challenges against Respondents, and this Court will benefit from the contributions of experienced, federal counsel in examining these claims. In addition, if an evidentiary hearing is necessary in this case, Petitioner will need the assistance of counsel for such a hearing.

1 Counsel has discussed eligibility for IFP status with Petitioner. Based on the
2 information provided by Petitioner, counsel can attest to her financial eligibility. A
3 signed financial affidavit has been filed with Ms. Moran's petition. Dkt. 1.

4 DATED this 31st day of December 2025.

5 Respectfully submitted,

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7 *s/ Ann K. Wagner*
8 Assistant Federal Public Defender
9 On behalf of
10 Doris Moran
11 Northwest Detention Center
12 1623 East J Street
13 Tacoma, WA 98421-1615
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