

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Jose VALADEZ HERNANDEZ, Alexi
VELAZQUEZ MUÑOZ, Guillermina
ALONSO HERNANDEZ, Wenseslao
ESCAMILLA MARQUEZ, Miguel
GONZALEZ LEGORETTA, Rosalba
PINEDA DE JESUS, Eric PINEDA DE
JESUS, Guillermo RUIZ ARREDONDO,

Petitioners,

v.

Laura HERMOSILLO, Seattle Acting Field
Office Director, Enforcement and Removal
Operations, U.S. Immigration and Customs
Enforcement; UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; Bruce SCOTT,
Warden, Northwest ICE Processing Center,

Respondents.

Case No. 2:26-cv-165

**PETITION FOR WRIT OF
HABEAS CORPUS**

**INDIVIDUAL
ENFORCEMENT OF
RODRIGUEZ VAZQUEZ
BOND DENIAL CLASS
JUDGMENT**

FACTS

1. Petitioners Jose Valadez Hernandez, Alexi Velazquez Muñoz, Guillermina Alonso Hernandez, Wenseslao Escamilla Marquez, Miguel Gonzalez Legoretta, Rosalba Pineda de Jesus, Eric Pineda de Jesus, and Guillermo Ruiz Arredondo bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

2. On September 30, 2025, this Court issued a final judgment “declar[ing] that Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ---, 2025 WL 2782499, at *27 (W.D. Wash. Sept. 30, 2025).

3. The Court further declared “that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” *Id.*

Petitioner Jose Valadez Hernandez

4. Petitioner Jose Valadez Hernandez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at Northwest ICE Processing Center (NWIPC) after being apprehended by U.S. Immigration and Customs Enforcement (ICE) on January 2, 2026, *see* Ex. A;²
- (b) entered the United States without inspection over twenty years ago and was not apprehended upon arrival; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

¹ The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing.” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ---, 2025 WL 2782499, at *6 (W.D. Wash. Sept. 30, 2025).

² All exhibit citations are to the authenticating declaration of Aaron Korthuis filed contemporaneously with this petition.

1 5. After apprehending Mr. Valadez Hernandez on January 2, 2026, the Department
2 of Homeland Security (DHS) placed him in removal proceedings pursuant to 8 U.S.C. § 1229a.
3 DHS has charged Mr. Valadez Hernandez as being inadmissible under 8 U.S.C.
4 § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. B.

5 6. On January 15, 2026, an Immigration Judge (IJ) denied Mr. Valadez Hernandez's
6 request for bond based on lack of jurisdiction and granted an alternative bond amount of
7 \$12,000. Ex. C.

8 **Petitioner Alexi Velazquez Muñoz**

9 7. Petitioner Alexi Velazquez Muñoz is a member of the Bond Denial Class, as he:

10 (a) does not have lawful status in the United States and is currently detained at
11 NWIPC after being apprehended by DHS on December 3, 2025, Ex. D;

12 (b) last entered the United States without inspection nearly fifteen years ago and
13 was not apprehended upon arrival;

14 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

15 8. Mr. Velazquez Muñoz was previously arrested and placed in removal proceedings
16 in 2014. *See* Ex. D. At the time, he was ordered released on bond. *Id.* In 2017, an IJ ordered him
17 removed in absentia, but the case was reopened later that same year. Mr. Velazquez Muñoz's
18 removal proceedings have remained pending since then. *See id.*

19 9. At the time Mr. Velazquez Muñoz was originally arrested in 2014, DHS placed
20 him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS charged Mr. Velazquez Muñoz
21 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
22 States without inspection. Ex. E.

23 10. On January 9, 2026, an IJ denied Mr. Velazquez Muñoz's request for bond based
24 on lack of jurisdiction and granted an alternative bond amount of \$10,000. Ex. F.

25 **Petitioner Guillermina Alonso Hernandez**

26 11. Petitioner Guillermina Alonso Hernandez is a member of the Bond Denial Class,
27 as she:

1 (a) does not have lawful status in the United States and is currently detained at
2 NWIPC after being apprehended by DHS on January 2, 2026, *see* Alonso
3 Hernandez Decl. ¶¶ 3–4;

4 (b) last entered the United States without inspection over thirty years ago and was
5 not apprehended upon arrival, *see id.* ¶ 2;

6 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

7 12. After apprehending Ms. Alonso Hernandez on January 2, 2026, DHS placed her
8 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Alonso Hernandez
9 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
10 States without inspection. Ex. G.

11 **Petitioner Wenseslao Escamilla Marquez**

12 13. Petitioner Wenseslao Escamilla Marquez is a member of the Bond Denial Class,
13 as he:

14 (a) does not have lawful status in the United States and is currently detained at
15 NWIPC after being apprehended by DHS on January 2, 2026, *see* Escamilla
16 Marquez Decl. ¶¶ 3–4;

17 (b) last entered the United States without inspection over thirty years ago and was
18 not apprehended upon arrival, *see id.* ¶ 2;

19 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231

20 14. After apprehending Mr. Escamilla Marquez on January 2, 2026, DHS placed him
21 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Escamilla Marquez
22 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
23 States without inspection. Ex. H.

24 **Petitioner Miguel Gonzalez Legoretta**

25 15. Petitioner Miguel Gonzalez Legoretta is a member of the Bond Denial Class,
26 as he:

27 (a) does not have lawful status in the United States and is currently detained at
NWIPC after being apprehended by DHS on November 22, 2025, Ex. I;

(b) last entered the United States without inspection over twenty years ago and
was not apprehended upon arrival, *see id.*;

(c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

1 16. After apprehending Mr. Gonzalez Legoretta on November 22, 2025, DHS placed
2 him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Gonzalez
3 Legoretta as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the
4 United States without inspection. Ex. J.

5 **Petitioner Rosalba Pineda de Jesus**

6 17. Petitioner Rosalba Pineda de Jesus is a member of the Bond Denial Class, as she:

7 (a) does not have lawful status in the United States and is currently detained at
8 NWIPC after being apprehended by DHS in January 2026, Rosalba Pineda de
Jesus Decl. ¶¶ 3–4;

9 (b) last entered the United States without inspection around five years ago and
was not apprehended upon arrival, *id.* ¶ 2;

10 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

11
12 18. After apprehending Ms. Pineda de Jesus in January 2026, DHS placed her in
13 removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has
14 charged or will charge Ms. Pineda de Jesus as being inadmissible under 8 U.S.C. §
15 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

16 **Petitioner Eric Pineda de Jesus**

17 19. Petitioner Eric Pineda de Jesus is a member of the Bond Denial Class, as he:

18 (a) does not have lawful status in the United States and is currently detained at
19 NWIPC after being apprehended by DHS in January 2026, Eric Pineda de
Jesus Decl. ¶¶ 3–4;

20 (b) last entered the United States without inspection over ten years ago and was
not apprehended upon arrival, *id.* ¶ 2;

21 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

22 20. After apprehending Mr. Pineda de Jesus in January 2026, DHS placed him in
23 removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has
24 charged or will charge Mr. Pineda de Jesus as being inadmissible under 8 U.S.C. §
25 1182(a)(6)(A)(i), as someone who entered the United States without inspection.
26
27

Petitioner Guillermo Ruiz Arredondo

21. Petitioner Guillermo Ruiz Arredondo is a member of the Bond Denial Class, as he:

(a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on December 26, 2025, Ruiz Arredondo Decl. ¶¶ 3–4;

(b) last entered the United States without inspection about over fifteen years ago and was not apprehended upon arrival, *id.* ¶ 2;

(c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

22. After apprehending Mr. Ruiz Arredondo on or around December 26, 2025, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Ruiz Arredondo as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

23. The Court should expeditiously grant this petition.

24. For all Petitioners, Respondents are bound by the judgment in *Rodriguez Vazquez*, as it has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue to flagrantly defy the judgment in that case and continue to subject Petitioners to unlawful detention despite their clear entitlement to consideration for release on bond as Bond Denial Class members.

25. The Court should accordingly order that within one day, Respondent DHS must release any Petitioner who has received an alternative bond order by an IJ, or allow for those Petitioners’ release upon payment of the alternative bond amount set by the IJ.

26. For any Petitioner without an alternative bond order, the Court should order their release unless Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days of Petitioner’s request.

JURISDICTION & VENUE

27. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the

1 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory
2 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

3 28. Venue is proper in this District because Petitioners are detained at the NWIPC in
4 Tacoma, Washington. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are
5 employees, officers, and agencies of the United States, and a substantial part of the events or
6 omissions giving rise to the claims occurred in this District.

7 **PARTIES**

8 29. Petitioner Jose Valadez Hernandez is currently detained at NWIPC. He is a
9 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

10 30. Petitioner Alexi Velazquez Muñoz is currently detained at NWIPC. He is a
11 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

12 31. Petitioner Guillermina Alonso Hernandez is currently detained at NWIPC. She is
13 a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

14 32. Petitioner Wenseslao Escamilla Marquez is currently detained at NWIPC. He is a
15 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

16 33. Petitioner Miguel Gonzalez Legoretta is currently detained at NWIPC. He is a
17 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

18 34. Petitioner Rosalba Pineda de Jesus is currently detained at NWIPC. She is a
19 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

20 35. Petitioner Eric Pineda de Jesus is currently detained at NWIPC. He is a member
21 of the Bond Denial Class certified in *Rodriguez Vazquez*.

22 36. Petitioner Guillermo Ruiz Arredondo is currently detained at NWIPC. He is a
23 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

24 37. Respondent Laura Hermosillo is the Seattle Acting Field Office Director of ICE's
25 Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is
26 responsible for Petitioners' detention and removal. She is named in her official capacity.
27

1 38. Respondent United States Department of Homeland Security (DHS) is the federal
2 agency responsible for implementing and enforcing the Immigration and Nationality Act (INA),
3 including the detention and removal of noncitizens.

4 39. Respondent Executive Office for Immigration Review (EOIR) is the federal
5 agency responsible for implementing and enforcing the INA in removal proceedings, including
6 for custody redeterminations in bond hearings.

7 40. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the
8 NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is
9 sued in his official capacity.

10 **CLAIMS FOR RELIEF**

11 **Violation of the INA:**

12 **Request for Relief Pursuant to *Rodriguez Vazquez***

13 41. Petitioners repeat, re-allege, and incorporate by reference each and every
14 allegation in the preceding paragraphs as if fully set forth herein.

15 42. As members of the Bond Denial Class, Petitioners are entitled to consideration for
16 release on bond under 8 U.S.C. § 1226(a).

17 43. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the
18 INA in applying the mandatory detention statute at § 1225(b)(2) to class members.

19 44. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's
20 declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C.
21 § 2201(a).

22 45. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are
23 subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under
24 the INA and this Court's judgment in *Rodriguez Vazquez*.

25 **PRAYER FOR RELIEF**

26 WHEREFORE, Petitioners pray that this Court grant the following relief:

27 a. Assume jurisdiction over this matter;

- 1 b. Issue a writ of habeas corpus requiring that within one day, Respondents release
2 any Petitioner with an alternative bond order unless Respondents allow for their
3 release upon payment of the alternative bond amount and any other conditions set
4 by the IJ;
- 5 c. Issue a writ of habeas corpus as to any Petitioners without an alternative bond
6 order requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a)
7 within seven days of a request from Petitioners;
- 8 d. Order that upon Petitioners' release, Respondents must return to Petitioners any
9 personal property, including any personal identification document (other than a
10 passport) and any employment authorization document;
- 11 e. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act
12 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under
13 law; and
- 14 f. Grant any other and further relief that this Court deems just and proper.

15 DATED this 16th day of January, 2026.

16 s/ Matt Adams

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s/ Leila Kang

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19 s/ Glenda M. Aldana Madrid

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s/ Aaron Korthuis

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21 s/ Amanda Ng

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