

Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALI ALI-HASSEN,

Petitioner,

v.

KRISTI NOEM, *et al.*,

Respondents.

Case No. 2:26-cv-00360-SKV

FEDERAL RESPONDENTS'
RETURN MEMORANDUM

Noted for Consideration:
February 23, 2026.

I. INTRODUCTION

This Court should deny Petitioner's Petition for a Writ of Habeas Corpus. Dkt. 1, (Petition or Pet.). Petitioner entered the United States without inspection or admission on January 27, 2022, was apprehended by Border Patrol shortly thereafter, and was served with an expedited removal order on January 28, 2022. He was released on an Order of Release on Recognizance (OREC) on February 11, 2022, after approximately 15 days in initial custody. He was re-detained on January 20, 2026, during a scheduled check-in, and as of the date of this response, has been in continuous custody for approximately 28 days during this current period of detention.

This Court should deny the relief sought here. Petitioner is subject to mandatory detention pursuant to 8 U.S.C. § 1225(b).

FEDERAL RESPONDENTS' RETURN MEMORANDUM
[Case No. 2:26-cv-00360-SKV] - 1

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II. FACTS AND PROCEDURAL BACKGROUND

A. Petitioner Ali Ali-Hassen

Petitioner is a native and citizen of Ethiopia, born in 1998. Decl. of Deportation Officer Gennadiy Baz (Baz Decl.) ¶ 3. On January 27, 2022, he entered the United States from Mexico at or near Calexico, California, without inspection or admission. *Id.* ¶ 4; Declaration of Lawrence Van Daley (Van Daley Decl.), Exhibit 1, 2022 I-213. Border Patrol agents apprehended him shortly after his entry, within 24 hours of his arrival. *Id.* On January 28, 2022, the Department of Homeland Security (DHS) served Petitioner with Form I-860, Notice and Order of Expedited Removal, charging him as inadmissible under 8 U.S.C. §§ 1182(a)(6)(C) and (a)(7). Baz Decl. ¶ 5; Van Daley Decl., Exhibit 3, Expedited Removal; Exhibit 1, 2022 I-213. During processing, Petitioner provided a sworn statement expressing a fear of return to Ethiopia, triggering a referral for credible fear screening. Baz Decl. ¶ 5.

Petitioner remained in DHS custody until February 11, 2022, when he was released on an Order of Release on Recognizance (OREC) after approximately 15 days of initial detention. *Id.* ¶ 6; Van Daley Decl., Exhibit 4, OREC. Following release, Petitioner's case file was forwarded to U.S. Citizenship and Immigration Services (USCIS) for a credible fear interview on March 8, 2022. *Id.* ¶ 7. On April 13, 2022, Petitioner filed Form I-589, Application for Asylum and for Withholding of Removal. *Id.* ¶ 8. On November 8, 2024, he submitted an application for Temporary Protected Status (TPS), which USCIS approved on April 3, 2025, with validity through December 12, 2025. Van Daley Decl., Exhibit 5, 2026 I-213; Baz Decl. ¶ 9.

On June 12, 2025, USCIS dismissed Petitioner's pending asylum application for lack of jurisdiction, citing the outstanding expedited removal order. Baz Decl. ¶ 10; Van Daley Decl., Exhibit 6, I-589 Dismissal. On January 20, 2026, Petitioner appeared for a scheduled check-in with Seattle Enforcement and Removal Operations (ERO). During that encounter, ERO took him

1 into custody and booked him into the Northwest ICE Processing Center (NWIPC) the same day.

2 *Id.* ¶ 11. On this same date, a Warrant for Arrest of Alien was issued and written notice of OREC
3 cancellation was provided. Van Daley Decl., Exhibit 8, Warrant; Exhibit 9, OREC Cancellation.

4 On January 23, 2026, Petitioner filed a request for bond redetermination with the Tacoma
5 Immigration Court. Baz Decl. ¶ 12. Following a bond hearing on January 29, 2026, the
6 Immigration Judge denied bond, concluding that the court lacked jurisdiction because Petitioner
7 is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). *Id.* ¶ 13. The IJ expressly relied
8 on *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), *Matter of M-S-*, 27 I&N Dec. 509
9 (A.G. 2019), and *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), and found that Petitioner is not a
10 member of the *Maldonado-Bautista* class because he was apprehended by Border Patrol within 24
11 hours of his unlawful entry. *Id.*; Van Daley Decl., Exhibit 2, Bond Order.

12 On the same date as the bond denial, DHS referred Petitioner to USCIS for a credible fear
13 interview. Baz Decl. ¶ 14. USCIS accepted the referral on February 2, 2026 and conducted the
14 credible fear interview on February 4, 2026, and issued a positive credible fear determination on
15 February 7, 2026. *Id.* ¶¶ 16-17. On February 9, 2026, DHS filed a Notice to Appear (NTA) with
16 the Executive Office for Immigration Review (EOIR), personally serving Petitioner with charges
17 of inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i). *Id.* ¶ 18; Van Daley Decl., Exhibit 7, Notice
18 to Appear. A master calendar hearing in removal proceedings is currently scheduled for February
19 25, 2026, in the Tacoma Immigration Court. *Id.*

20 **B. Detention Authority**

21 **1. Statutory Framework**

22 The Immigration and Nationality Act (INA) provides a detailed framework for the
23 detention of aliens during removal proceedings, distinguishing between those seeking admission
24 and those already present in the United States. 8 U.S.C. § 1225(b)(2)(A) mandates detention for

1 "any alien" who is "an applicant for admission" and "not clearly and beyond a doubt entitled to be
2 admitted," providing that "the alien shall be detained for a proceeding under section 1229a of this
3 title." An "applicant for admission" is defined broadly to include "[a]n alien present in the United
4 States who has not been admitted or who arrives in the United States (whether or not at a designated
5 port of arrival and including an alien who is brought to the United States after having been
6 interdicted in international or United States waters)." 8 U.S.C. § 1225(a)(1). This encompasses
7 aliens who enter without inspection (EWI) and are apprehended near the border shortly after entry,
8 as they remain "applicant[s] for admission" until formally admitted. *See id.*; 8 U.S.C. §
9 1182(a)(6)(A)(i).

10 In contrast, 8 U.S.C. § 1226(a) authorizes discretionary detention "pending a decision on
11 whether the alien is to be removed from the United States," with eligibility for bond or conditional
12 parole, but applies only to aliens not subject to mandatory detention under other provisions,
13 including 8 U.S.C. § 1225(b). Release from 8 U.S.C. § 1225(b) custody is strictly limited; the
14 statute provides no mechanism for bond hearings before an immigration judge (IJ), and
15 discretionary release is confined to forms of administrative release consistent with the expedited
16 removal framework. An Order of Release on Recognizance (OREC) issued in this context does
17 not alter the underlying statutory authority of 8 U.S.C. § 1225(b); it is a form of administrative
18 release that reverts to mandatory detention upon re-encounter. *See* 8 C.F.R. § 236.1(c).

19 2. Mandatory Detention under 8 U.S.C. § 1225(b)

20 The Supreme Court has held that 8 U.S.C. § 1225(b) imposes mandatory detention without
21 bond hearings until removal proceedings conclude. *Jennings v. Rodriguez*, 583 U.S. 281 (2018).
22 In *Jennings*, the Court rejected any implied requirement for periodic bond hearings, explaining
23 that 8 U.S.C. §§ 1225(b)(1) and (b)(2) "mandate detention of applicants for admission until certain
24 proceedings have concluded." *Id.* at 298. The Court emphasized Congress's intent: "Congress has

1 directed that the alien 'shall be detained' until the completion of the relevant proceedings." *Id.* at
2 300 (quoting 8 U.S.C. § 1225(b)). Similarly, in *Demore v. Kim*, 538 U.S. 510 (2003), the Court
3 upheld the constitutionality of mandatory detention during removal proceedings, recognizing the
4 government's "strong interest in ensuring the removal of those aliens who have been ordered
5 deported." *Id.* at 531.

6 The BIA has extended this framework to EWI aliens. In *Matter of M-S-*, 27 I&N Dec. 509
7 (A.G. 2019), the Attorney General held that aliens initially placed in expedited removal who
8 receive a positive credible fear determination "remain ineligible for release on bond" under 8
9 U.S.C. § 1225(b) until proceedings conclude, even after transfer to full 8 U.S.C. § 1229a
10 proceedings. *Id.* at 515-16. This ruling overruled prior precedent and aligns with *Jennings*,
11 confirming that such aliens are "detained for further consideration of the application for asylum."
12 *Id.* (quoting 8 U.S.C. § 1225(b)(1)(B)(ii)).

13 3. Order of Release on Recognizance

14 An Order of Release on Recognizance (OREC, Form I-220A) permits the discretionary
15 release of certain aliens in immigration proceedings to be freed without a monetary bond, subject
16 to conditions such as period reporting and compliance with immigration requirements. Revocation
17 is permitted at any time in agency discretion, without a specific violation required, leading to re-
18 detention. *See* 8 C.F.R. 236.1(c)(9).

19 This Court has scrutinized such revocations for due process violations. *See E.A. T.-B. v.*
20 *Wamsley*, 795 F. Supp. 3d 1316, 1324 (W.D. Wash. 2025). In *E.A. T.-B.*, the court held that OREC
21 creates a conditional liberty interest requiring some process before revocation. *See id.* Here,
22 Petitioner was provided with written notice of his OREC revocation due to USCIS dismissing his
23 I-589 for lack of jurisdiction due to the expedited removal order. Van Daley Decl., Exhibit 5, 2026
24 Form I-213.

4. The Maldonado-Bautista Class and Its Limitations

In *Maldonado Bautista v. Santacruz Jr.*, No. 5:25-cv-01873 (C.D. Cal. Dec. 18, 2025) (final judgment), the district court certified a nationwide "Bond Eligible Class" of EWI aliens "who . . . were not or will not be apprehended upon arrival" and detained under 8 U.S.C. § 1226(a), entitling them to bond hearings. *Id.*, Dkt. 94. The class explicitly excludes those "apprehended upon arrival," defined as aliens detained "near the border [or] shortly after entry." *Id.*; see also *Del Valle Castillo v. Wamsley*, No. 2:25-cv-02054-TMC (W.D. Wash. Nov. 26, 2025) (recognizing similar limitations). The judgment is declaratory in nature and does not constitute a nationwide injunction vacating BIA precedent.

III. LEGAL STANDARD

This Court has jurisdiction to review the legality of immigration detention under 28 U.S.C. § 2241. *Zadvydas v. Davis*, 533 U.S. 678, 688 (2001). However, review is "narrow" and deferential, limited to whether detention exceeds statutory authority or violates due process. *Jennings*, 583 U.S. at 301. As-applied constitutional challenges to prolonged detention may arise, but brief detention tied to active proceedings does not. See *Rodriguez Diaz v. Garland*, 55 F.4th 1128, 1136-38 (9th Cir. 2022).

IV. ARGUMENT

A. Petitioner is an Applicant for Admission

Petitioner falls within the definition of an "applicant for admission" under 8 U.S.C. § 1225(a)(1). As an alien who entered the United States without inspection near Calexico, California, on January 27, 2022, he was never lawfully admitted. See 8 U.S.C. § 1225(a)(1) (any alien present without admission is an applicant for admission); See *Buenrostro-Mendez v. Bondi*, No. 25-20496, 2026 WL 323330, at *2 (5th Cir. Feb. 6, 2026); *Matter of Q. Li*, 29 I&N Dec. 66, 69 (BIA 2025). His inadmissibility under Section 1182(a)(6)(A)(i) for presence without admission further

confirms this status. *See Torres*, 976 F.3d at 924. Petitioner's duration of unlawful presence in the United States does not alter this classification; the statute imposes no temporal limit on applicant status for those never admitted. *See Buenrostro-Mendez v. Bondi*, No. 25-20496, 2026 WL 323330 *15-16 (5th Cir. Feb. 6, 2026).

Moreover, Petitioner's affirmative applications for asylum, withholding of removal, and Convention against Torture (CAT) protection underscore his status as an applicant for admission. By seeking these forms of relief, Petitioner is explicitly requesting permission to remain in the United States, which constitutes an application for admission under the Immigration and Nationality Act (INA). *See* 8 U.S.C. § 1158(a)(1); *see also Thuraissigiam*, 591 U.S. at 112. Asylum, if granted, leads to lawful permanent residence and eventual citizenship, effectively granting admission. 8 U.S.C. § 1159(b). Withholding of removal and CAT protection, while not conferring permanent status, similarly allow the alien to remain in the United States, reinforcing the pursuit of admission-like relief. *See INS v. Cardoza-Fonseca*, 480 U.S. 421, 428-29 (1987). Petitioner's filings thus affirm his intent to seek admission, subjecting him to 8 U.S.C. § 1225(b)'s mandatory detention regime pending adjudication. *See Matter of Yajure Hurtado*, 29 I&N Dec. at 219-20.

Petitioner's initial OREC release was a temporary conditional release, which does not constitute admission and may be revoked when no longer warranted. *See also* 8 C.F.R. § 236.1; *Matter of Q. Li*, 29 I&N Dec. at 6. Upon revocation, Petitioner reverted to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). *Matter of Yajure Hurtado*, 29 I&N Dec. at 220. This statutory framework authorizes Petitioner's current detention.

B. Petitioner Is Lawfully Detained Under 8 U.S.C. § 1225(b) and Not Section 1226(a)

Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b). As an EWI alien apprehended within 24 hours of entry near the border, served an I-860, and placed in expedited

1 removal, he is an "applicant for admission" "not clearly and beyond a doubt entitled to be
2 admitted." 8 U.S.C. § 1225(b)(2)(A); Baz Decl. ¶¶ 4-5; Van Daley Decl., Exhibit 3 Expedited
3 Removal. His subsequent OREC release, issued post-apprehension, did not convert custody to
4 discretionary 8 U.S.C. § 1226(a) authority. *See Matter of Q. Li*, 29 I&N Dec. 66, 68-69 (BIA
5 2025). The IJ's jurisdictional denial was correct. *Matter of Yajure Hurtado*, 29 I&N Dec. 216, 222-
6 24 (BIA 2025); *Matter of M-S-*, 27 I&N Dec. 509, 515-16 (A.G. 2019).

7 This detention authority stems directly from the statutory text. Section 1225(b)(2)(A)
8 requires detention of "any alien" who is an "applicant for admission" and "not clearly and beyond
9 a doubt entitled to be admitted." 8 U.S.C. § 1225(b)(2)(A). The term "applicant for admission" is
10 expansive, encompassing "an alien present in the United States who has not been admitted." 8
11 U.S.C. § 1225(a)(1). Petitioner's apprehension "within 24 hours of his last entry" by Border Patrol
12 "at or near" the border places him within this category. Baz Decl. ¶ 13; Van Daley Decl., Exhibit
13 1, 2022 I-213.)

14 The OREC was an administrative release during credible fear processing, not a
15 determination under 8 U.S.C. § 1226(a). *See* 8 C.F.R. § 236.1(c) (detention authority remains with
16 the underlying statutory provision). Upon re-detention on January 20, 2026, following TPS
17 expiration, custody reverted to the original 8 U.S.C. § 1225(b) framework. *Matter of Q. Li*, 29 I&N
18 Dec. at 68. This is consistent with *Jennings*, where the Supreme Court rejected efforts to imply
19 bond eligibility into 8 U.S.C. § 1225(b), holding that "Congress has directed that the alien 'shall
20 be detained' until the completion of the relevant proceedings." *Jennings* 583 U.S. at 300.

21 This conclusion is further supported by the Fifth Circuit's recent decision in *Buenrostro-*
22 *Mendez v. Bondi*, No. 25-20496 (5th Cir. Feb. 6, 2026). There, the court held that "individuals
23 present in the United States without having been admitted, regardless of how long they have
24 resided here, are deemed 'applicants for admission' under 8 U.S.C. § 1225(a)(1) and are therefore

1 subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) without eligibility for bond during
2 removal proceedings." *Buenrostro-Mendez v. Bondi*, No. 25-20496, 2026 WL 323330 *2 (5th Cir.
3 Feb. 6, 2026). The panel reversed habeas grants ordering bond hearings, emphasizing that the
4 statutory text controls over prior agency practice and that "years of consistent practice cannot
5 vindicate an interpretation that is inconsistent with a statute's plain text." *Id.* at 10-11. Although
6 not binding in this Circuit, *Buenrostro-Mendez* provides persuasive authority confirming the
7 government's application of 8 U.S.C. § 1225(b) here.

8 Federal Respondents' have carefully reviewed this petition and determined that the primary
9 legal issue presented concerns the statutory authority for ICE detention of Petitioner under 8 U.S.C.
10 §§ 1225(b)(2) or 1226(a) and whether Petitioner is entitled to a bond hearing. It is the
11 government's position that Petitioner is subject to mandatory detention under 8 U.S.C. §
12 1225(b)(2)(A) because he was present in the United States without being admitted or paroled.
13 However, Federal Respondents acknowledge that courts in this District have reached the opposite
14 conclusion in similar cases. *See Rodriguez Vazquez v. Bostock*, No. 3:25-cv-05240-TMC, 2025
15 WL 2782499 (W.D. Wash. Sept. 30, 202). In *Rodriguez Vazquez*, the Court found that Section
16 1225(b) does not apply to aliens arrested in the interior after prior release or presence in the United
17 States. *Id.*

18 On the legal issue of which statute governs Petitioner's detention here – whether it is
19 Section 1226(a) or Section 1225(b) – Federal Respondents acknowledge that the Court's decision
20 in *Rodriguez Vazquez* would be relevant here if the Court adheres to that decision, as the facts are
21 similar for the purposes of this Court's decision on the legal issue of which statutory provision
22 authorizes Petitioner's detention.

23 Thus, while Federal Respondents do not consent to issuance of the writ and reserve all
24 rights, including the right to appeal, and to conserve judicial and party resources while expediting

1 the Court's consideration of this case, the government hereby relies upon, and incorporates by
2 reference, the legal arguments presented by the government in *Rodriguez Vazquez*, and the Court
3 can decide this issue without further briefing.

4 If this Court finds that Petitioner is detained pursuant to Section 1226(a), then the
5 appropriate relief would be for this Court to order the immigration court to provide Petitioner with
6 a bond hearing. Petitioner's request for a hearing with the burden on the government by clear and
7 convincing evidence is contrary to law. The Supreme Court has rejected reading such requirements
8 into immigration detention statutes. *See Jennings v. Rodriguez*, 583 U.S. 281, 303-04 (2018); *see*
9 *also, Johnson v. Arteaga-Martinez*, 596 U.S. 149, 157-58 (2022).

10 **C. Petitioner is Not a Member of the Maldonado-Bautista Class**

11 Petitioner is not a member of the *Maldonado Bautista* class. The *Maldonado Bautista* class
12 is narrowly circumscribed to EWI aliens "who . . . were not or will not be apprehended upon
13 arrival." *Maldonado Bautista v. Santacruz Jr.*, No. 5:25-cv-01873, Dkt. 94 (C.D. Cal. Dec. 18,
14 2025) (defining "Bond Eligible Class" as those "not . . . apprehended upon arrival"). Petitioner was
15 apprehended "within 24 hours of his last entry" by Border Patrol "at or near" the border. Baz Decl.
16 ¶ 13; Van Daley Decl., Exhibit 1, 2022 I-213. This places him outside the class, as confirmed by
17 the IJ's ruling—a factual determination entitled to deference. *See Matter of Q. Li*, 29 I&N Dec. at
18 69 (apprehension "near the border" precludes § 1226(a) classification).

19 The class definition turns on the timing and circumstances of apprehension, which the
20 record unequivocally shows occurred "upon arrival." *Maldonado Bautista*, Dkt. 94. The IJ's
21 explicit finding that Petitioner is not a class member resolves this issue, and federal courts defer to
22 such administrative determinations in habeas review absent extraordinary circumstances. *See*
23 *Zadvydas*, 533 U.S. at 699.

24 **D. Petitioner's Detention Does Not Violate Due Process**

1 Petitioner's detention is fully consistent with the Due Process Clause of the Fifth
2 Amendment. As established by the Supreme Court and the Ninth Circuit, mandatory detention
3 under 8 U.S.C. § 1225(b) does not violate due process. In *Jennings v. Rodriguez*, 583 U.S. 281,
4 301 (2018), the Court held that "[n]o constitutional concerns . . . arise from detention during
5 removal proceedings," rejecting any implied limitations on § 1225(b) detention. Similarly, *Demore*
6 *v. Kim*, 538 U.S. 510, 531 (2003), upheld mandatory detention as constitutional, recognizing the
7 government's compelling interest in "ensuring the removal of those aliens who have been ordered
8 deported" and the "strong interest in ensuring that [removal] proceedings are not undermined by
9 the flight of aliens who have been ordered deported." *Id.* These precedents control here, as
10 Petitioner's detention is directly authorized by 8 U.S.C. § 1225(b)(2)(A) and tied to active removal
11 proceedings.

12 As a recent entrant who was apprehended shortly after unlawful entry, Petitioner qualifies
13 as an "applicant for admission" with only minimal due process protections. *Dep't of Homeland*
14 *Sec. v. Thuraissigiam*, 591 U.S. 103, 107 (2020); *Landon v. Plasencia*, 459 U.S. 21, 32 (1982).
15 The expedited removal processing, credible fear screening, and full removal proceedings provides
16 all the process that is due. *See Jennings*, 583 U.S. at 301.

17 Applying the procedural due process framework of *Mathews v. Eldridge*, 424 U.S. 319,
18 335 (1976), Petitioner's claim fails. *See Todd v. Bondi*, No. 2:25-cv-02519 (W.D. Wash. Jan. 20,
19 2026). First, the private interest at stake is significant but tempered by the civil, non-punitive
20 nature of immigration proceedings and Petitioner's status as an applicant for admission. *See*
21 *Demore*, 538 U.S. at 531. Second, the risk of erroneous deprivation is minimal because the
22 detention is mandatory under clear statutory criteria, with no discretionary elements requiring
23 additional process. The IJ's jurisdictional ruling was based on facts from the administrative record,
24 including the I-213 and apprehension details. Third, the government's interest in mandatory

1 detention is overwhelming: it ensures appearance at proceedings, protects the public, and prevents
2 circumvention of removal orders. *Demore*, 538 U.S. at 531; *see also Rodriguez Diaz v. Garland*,
3 55 F.4th 1128, 1137 (9th Cir. 2022). Balancing these factors, the credible fear interview, NTA
4 issuance, and imminent master calendar hearing, satisfy due process.

5 Moreover, Petitioner's detention has been brief. During the current period of detention,
6 from re-detention on January 20, 2026, custody has lasted approximately 28 days. Including the
7 initial period of custody from January 27, 2022, to release on February 11, 2022 (approximately
8 15 days), Petitioner's cumulative detention time amounts to approximately 42 days. This duration
9 is not "prolonged" under any applicable standard. *See Rodriguez Diaz*, 55 F.4th at 1136-38. Pre-
10 *Jennings* cases like *Rodriguez v. Robbins*, 715 F.3d 1127, 1139 (9th Cir. 2013) (suggesting a six-
11 month threshold), are superseded and inapplicable to 8 U.S.C. § 1225(b) mandatory detention.
12 *Jennings*, 583 U.S. at 300 (foreclosing implied time limits). Even if a "prolonged" analysis applied,
13 the short cumulative duration here of approximately 42 days total, with only 28 days in the current
14 period, coupled with active proceedings, negates any constitutional concern. *See also Padilla v.*
15 *ICE*, No. 2:18-cv-00068 (W.D. Wash.).

16 Finally, the Fifth Circuit's recent decision in *Buenrostro-Mendez v. Bondi*, No. 25-20496
17 (5th Cir. Feb. 6, 2026), while addressing the statutory framework, does not undermine these
18 constitutional principles. The panel explicitly noted that its holding was limited to statutory
19 interpretation and left open constitutional challenges to prolonged detention. *Id.* at 15 n.6.
20 Petitioner's due process rights are fully protected, and the government's position is correct as a
21 matter of law.

22 V. CONCLUSION

23 For the foregoing reasons, this court should deny the relief sought here.

24 //

1 DATED this 17th day of February, 2026.

2 Respectfully submitted,

3 s/ Lawrence Van Daley

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14 I certify that this memorandum contains 3,595
15 words, in compliance with the Local Civil Rules.