

Ezequiel Lopez-Cruz

A- 

1623 East J. Street, Suite 5
Tacoma, WA 98421



MAR 16 2026

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

Case No. 2:26-CV-00495-TSZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE AT SEATTLE

EZEQUIEL LOPEZ CRUZ

Petitioner

vs.

PAMELA BONDI: U.S. ATTORNEY GENERAL
UNITED STATES OF AMERICA, ET AL..

Respondents,

TRAVERSE MOTION TO RESPONDENT'S
OPPOSITION TO WRIT OF HABEAS CORPUS

COMES NOW, Ezequiel Lopez-Cruz, pro-se without representation of counsel files this Traverse Motion In Support of his Writ of Habeas Corpus, which now is ripe for final adjudication.

This traverse response is timely based upon the Court's briefing schedule and Respondent's return received on 03/06/2026 and in keeping with the Court's order, being returned timely within the 5 day deadline. See: Attached copy of envelope, enclosed and made part of this filing by reference.

Relief Requested

This Honorable court should grant Petitioner an immediate release for the following reasons:

1. Petitioner had filed a Habeas Corpus Motion For Release in good faith in keeping with the rules that govern Habeas Corpi petitions and preservation of Petitioner's protected rights as a matter of law.
2. Respondent's motion is untimely, because Respondents had never requested an extension or enlargement of time mandated by statute, rules of court and this Honorable Court's order certified under the briefing schedule; and
3. In keeping with the mandate's of said Court order, this Honorable Court never granted Respondent's an extension of time and or order granting Respondents application for enlargement of time; and
4. As such, Respondent's motion in opposition is lawful, untimely and should be denied refused for cause by operation of law; and
5. Respondent's assumption that Petitioner failed to establish any threat of imminent, irreparable harm, is baseless. The Constitution of the United States clearly supports Petitioner's position of unlawfully detained for a longer period mandated by the Constitution and qualified as the burden of proof requirement for the immediate injury prong mandated by this habeas corpus protection; and
6. Therefore Petitioner's motion for relief is in keeping with the good order of this Court and mandates of the habeas corpus requirement now in this court for final adjudication; and
7. Petitioner request that either the Honorable Court or it's Clerk Order the immediate release of Petitioner is just and proper as noted above; and
8. No money damage can replace Petitioner's loss of time and unlawfully being detained as noted above, distinguishing Petitioner's from any other person in immigration detention unless similarly situated and detained; and
9. Additionally, Petitioner avers that ICE unlawfully arrested and is detaining him under false pretenses by perpetrating Fraud upon the Court as guaranteed by the U.S. Constitutional protections: *A warrant for arrest shall be signed by signed by a Federal or State Judge (not by any ICE official,*

unqualified to do so) that is not part of the Constitution of the United States or any other Constitution of any state of the union; emphasis added See: EXHIBIT "A" copy of the unlawful alleged arrest warrant being used by ICE officials to keep Petitioner arrested-detained, which has already been recorded in this action, enclosed and made part of this filing; and

10. Further, *per the Constitutional protections and requirements: detention is unlawful after 3 days* and converts into a full blow arrest, which is to be supported by a certified warrant or probable cause, with specificity of the crime committed and remedy for relief; and

11. Petitioner request that this Honorable Court to take notice of the ambiguity and word play by ICE officials in the terms:

"immigration officers arrested Petitioner and charged him as removable...: This is a false, ambiguous statement and later.."and he remains detained." The applicable statement if used in this context should read "***Charged with a crime***, and not charged as..." this is not Constitutionally permissible and is therefore false upon it's face and qualifies Petitioner in itself for relief.; and

12. Further, the assumption that Petitioner is unlawfully in the United States is also false. In fact, Petitioner is and was in fact lawfully documented to be in the United States as a DACA Recipient, and Respondents are leading the Court to believe otherwise, such action is unscrupulous and baseless and should be stricken from the record as a blatant lie and false statement by ICE officials, in fact, both Declarations by the 2 ICE officials, as a matter of law should be stricken from the record; and

13. Petitioner's detention has now become punitive under the mandates of his Constitutional protections and precedents established by the United States Supreme Court decisions; and

14. Bruce Scott: Warden of the Northwest Immigration Detention Center along with Pamela Bondi: U.S. Attorney General, Agents, Successors and or Assigned are now engaged in a scheme of punitive removal without providing fair notice and an opportunity to contest Petitioner's removal; and

15. For all the above stated reasons and Petitioner's Constitutional protections of liberty interest, procedural violations et etc. Petitioner's detention has become indefinite: and

Prayer for relief

EZEQUIEL LOPEZ CRUZ, whom is being held against his will and his liberties in violation of his Constitutional protections, rights of liberty interest and laws of the United States, avers declares and request that this Honorable Court issue the following order:

- A. Petitioner humbly request that this Honorable Court issue his immediate release from detention/incarceration; and
- B. This Honorable Court to provide a hearing to assess whether Petitioner is a danger to society and or is an immediate flight risk; and
- C. This Honorable Court to grant Petitioner the opportunity to contest the removal proceedings and any filings by Respondent's in protection of Petitioner's procedural right of liberty interest and procedural Due Process and equal protection under law; and
- D. Issue equitable remedy requested above; and
- E. To issue conditions of release subjected to both parties of record without prejudicing Petitioner; and
- F. The Honorable Court to issue any and all remedies deem just and proper by law.

Certified true and correct (28 U.S.C. § 1746). All rights reserved.

Respectfully submitted,

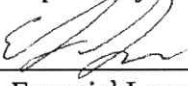
By: 
Ezequiel Lopez-Cruz

Exhibit A

U.S. DEPARTMENT OF HOMELAND SECURITY

File No. [REDACTED]

Date: 11/19/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that LOPEZ-Cruz, Ezequiel is removable from the United States. This determination is based upon:

- ☐ the execution of a charging document to initiate removal proceedings against the subject;
- ☐ the pendency of ongoing removal proceedings against the subject;
- ☐ the failure to establish admissibility subsequent to deferred inspection;
- ☒ biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- ☒ statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

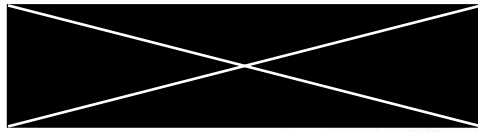
[Signature]
(Signature of Authorized Immigration Officer)

SIBPA Dana Holder
(Printed Name and Title of Authorized Immigration Officer)

Certificate of Service

I hereby certify that the [REDACTED] was served by me at Woodland, WA
(Location)
on LOPEZ-Cruz, Ezequiel on 11/19/2025, and the contents of this
(Name of Alien) (Date of Service)
notice were read to him or her in the English language.
(Language)
BPA David Smith [Signature] [Signature]
Name and Signature of Officer Name or Number of Interpreter (if applicable)

United States Attorney's Office
Western District of Washington
80 Stewart Street, Suite 5210
Seattle, Washington 98101-1271
Official Business



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FIRST-CLASS



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(FI)

LEGAL MAIL
OPEN IN PRESENCE OF
DETAINEE

Ezequiel Lopez Cruz

Northwest ICE Processing Center
1623 E. J Street, Suite 5
Tacoma, WA 98421-161

Certificate of Service



Case No. 2:26-CV-00945-TSZ



MAR 16 2026

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

On this 9th day of March, 2026. I, Ezequiel Lopez-Cruz, certify that I sent a true and correct copy of the documents and sundry papers to recipients by hand delivery into the Institution's mailbox in a pre-paid first class envelope in accord with the "Prison Mailbox Rule" [Houston v. Lack, 487 U.S. 266, (1988)]. Service to:

1. Clerk, United States District Court/Western District of Washington, at Seattle, 700 Stewart Street, Suite 2310, Seattle, Washington 98101
2. Lawrence Van Daley: Special Assistant United States Attorney, Western District of Washington, 700 Stewart Street, Suite 5220, Tacoma, Washington, 98101-1271

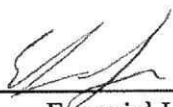
CONTAINING

1. This Certificate of Service
2. Traverse From Respondent's Opposition to Writ of Habeas Corpus
3. EXHIBIT "A"
4. Other Documents of Record

Certified true and correct [28 USC 1746(1)]. All rights reserved.

Respectfully submitted,

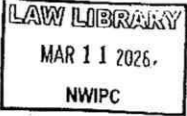
By: _____


Ezequiel Lopez-Cruz

**Notice to Principal is Notice to Agent
Notice to Agent is Notice to Principal**

(Certificate of Service)
(Cover Page)

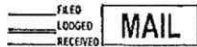
Name: *Erin L. L...*
A# *[redacted]*
Northwest Ice Processing Center
1623 E J Street
Tacoma, WA 98421



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FIRST-CLASS MAIL
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\$002.44⁹
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US POSTAGE

*Clerk, United States District Court
700 Stewart street, suite 2310
Seattle, WA 98101*



MAIL

MAR 16 2026

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WESTERN DISTRICT OF WASHINGTON
BY DEPUTY