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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

VICTOR GOMEZ-VALDOVINOS, (A-[redacted])	
Petitioner,	**CIVIL CASE NO.: 2:26-CV-01909-MLP**
v.	
BRUCE SCOTT, et al.,	**PETITIONER'S REPLY IN SUPPORT OF HIS PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND REQUEST FOR INJUNCTIVE RELIEF**
Respondents.	

PETITIONER'S REPLY SUPPORTING HIS PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND REQUEST FOR INJUNCTIVE RELIEF

I. INTRODUCTION

Petitioner Victor Gomez-Valdovinos, by and through undersigned counsel, respectfully submits this reply to address Respondent's misleading arguments put forth in their Opposition to Mr. Gomez-Valdovinos' Habeas Petition. Resp'ts' Opp., ECF No. 9.

II. ARGUMENT

Throughout their opposition, Respondents emphasize the fact that Petitioner was detained at "the Spokane Application Support Center at the Thomas Foley Federal Courthouse." Resp'ts'

Opp. at 4. But Respondents omit a critical fact: Mr. Gomez-Valdovinos was only present at the Application Support Center to complete biometrics for his pending T-visa application. *See* ECF No. 1 at 7; *see also* ECF No. 1, Ex. A, Gomez-Valdovinos' Decl.

Recently, in *Immigration Center for Women and Children v. Noem* ("*ICWC v. Noem*"), the District Court for the Central District of California granted nationwide preliminary relief protecting individuals with pending T-visa, U-visa, and VAWA-based applications from immigration enforcement actions that undermined Congress' intent for creating such humanitarian-relief. *Immigr. Ctr. for Women & Child. v. Noem*, --F.R.D.--, No. 2:25-CV-09848-AB-AS, 2026 WL 1455004, at *35-46 (C.D. Cal. May 20, 2026). The District Court concluded that removal before meaningful consideration of the protections associated with humanitarian-relief (such as T-visa, U-visa, and VAWA-based applications) could cause irreparable harm. *Id.* at *42-45. As such, the District Court ordered class wide relief preserving humanitarian-relief applicants' ability to pursue their pending forms of relief while the *ICWC v. Noem* litigation proceeds. *Id.* at *45-47.

The *ICWC v. Noem* decision reflects judicial recognition that the pendency of trafficking victim's and other survivor-based applications is a significant equitable consideration in instances where, as here, removal is imminent. Indeed, Respondents' own evidence underscores the necessity of the instant Petition. In support of their Opposition, Respondents supplied a declaration from ICE Officer Baz, who is assigned to the Enforcement and Removal Operations ("ERO") division. Baz Decl., ECF No. 10. Within the declaration, ICE ERO Officer Baz represents that Petitioner's removal is imminent. Baz Decl. at 2. Far from undermining the need for judicial

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intervention, that declaration confirms it. The Baz declaration therefore demonstrates that the threatened injury is neither speculative nor remote, but immediate and concrete, and confirms the need to preserve the *status quo* until EOIR resolves Mr. Gomez-Valdovinos' claims. Absent relief from this Court, Mr. Gomez-Valdovinos faces removal before he can obtain meaningful review of both his motion to reopen *and* his pending T-visa.

As a final note, while Respondents contend that Mr. Gomez-Valdovinos should "present his motion to reopen and any stay request to the Tacoma Immigration Court in the first instance," Resp't's Opp. at 7, a full review of Petitioner's Habeas Petition would show Respondents that Petitioner is *already* in the process of adjudicating such a request with EOIR.[1] Which is the precise reason behind filing the instant petition—to ensure that Petitioner, who has a pending T-visa *and* is actively seeking reopening of his removal proceedings, is not removed until his requests are litigated. Mr. Gomez-Valdovinos' imminent removal while the T-visa application remains pending, and while his motion to reopen is adjudicated, would effectively deprive him of the opportunity to obtain a determination on both applications, which weighs heavily in favor of preserving the *status quo* pending further review.

III. CONCLUSION

For the foregoing reasons, as well as those laid out in Mr. Gomez-Valdovinos' Habeas Petition, Mr. Gomez-Valdovinos respectfully requests this Court grant the instant Habeas Petition

[1] On June 9, 2026, the Tacoma Immigration Court denied both Petitioner's motion to reopen his removal proceedings based on changed circumstances and his related motion to stay removal. Petitioner has since begun discussing an appeal of the decision to the Board of Immigration Appeals, which would include a request for a stay of removal.

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and prevent Respondents from removing Mr. Gomez-Valdovinos while both his motion to reopen and T-visa application remain pending.

Dated: June 22, 2026

Respectfully Submitted,

By: s/ Clayton Cook-Mowery
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CERTIFICATE OF COMPLIANCE

Pursuant to LCR 7(d)(4), (e)(4), and LCR 65(b)(2)-(3), I certify that Petitioner's Reply Supporting his Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 and Request for Injunctive Relief contains 627 words, in compliance with the Local Civil Rules.

Respectfully submitted June 22, 2026.

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CERTIFICATE OF SERVICE

Pursuant to LCR 65(b)(1) I, Clayton Cook-Mowery, counsel for Petitioner, do hereby certify that on June 22, 2026, I contemporaneously served Petitioner's Reply in Support of his Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 and Request for Injunctive Relief upon Respondents at the time of filing via the CM/ECF system.

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