The Honorable Tiffany M. Cartwright

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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| Pedro ZAMORA-CERVANTES et al.,<br><br>Petitioners,<br><br>v.<br><br>Julio HERNANDEZ et al.,<br><br>Respondents. | Case No. 2:26-cv-2540-TMC<br><br>**PETITIONERS' TRAVERSE** |

Respondents acknowledge that Petitioners are members of the Bond Denial class in *Rodriguez Vazquez v. Bostock*, 802 F. Supp. 3d 1297 (W.D. Wash. 2025). Dkt. 9 at 1. The parties also agree that the Court should dismiss the claims of Petitioners Mario Martinez Alcaraz and Jaime Cortes Cortes, and order Respondents to provide the remaining Petitioners[1] a bond hearing pursuant to 8 U.S.C. § 1226(a). Dkt. 9 at 4 & n.2; *see also* Dkt. 1, Prayer for Relief (c).

[1] Petitioner Lazaro Morales Urieta has filed an individual petition for a writ of habeas corpus before this Court. *Morales Urieta v. Scott*, No. 2:26-cv-02570-TMC (filed July 21, 2026). No expedited briefing schedule has been requested in that case; the petition is currently noted for consideration on August 10, 2026. *See id.* Dkt. 2 (Scheduling Order). Undersigned counsel has been unable to reach Mr. Morales Urieta's counsel in that case or obtain a copy of his petition, and Mr. Morales Urieta has not sought to dismiss his claim in this case. To the extent his later-filed individual petition raises the same claim, the Court should decide this case to afford him expeditious relief. *Cf.* 28 U.S.C. § 2243 ("A court . . . entertaining an application for a writ of habeas corpus shall forthwith award the writ . . . unless it appears from the application that the applicant or person detained is not entitled thereto.").



NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Avenue, Suite 400
Seattle, WA 98104
Tel. (206) 957-8611

Respectfully submitted this 23rd day of July, 2026.

s/ Leila Kang
Leila Kang, WSBA No. 48048
Northwest Immigrant Rights Project
615 Second Ave., Suite 400
Seattle, WA 98104
(206) 816-3847
leila@nwirp.org
*Counsel for Petitioners*

*I certify that the foregoing contains 234 words, in compliance with the Local Civil Rules.*