UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Ricardo ALVARADO CARPIO, Cebero BAHENA BAHENA, Noberto BERNABE-VEGA, Jose DE LA CRUZ BRIONES, Johnny ESPINOZA ROMERO, Gerardo GARCIA GARCIA, Felipe LOPEZ-PASCUAL, Alejandro LUCATERO-SEPULVEDA, Luis MARQUEZ-ARZAPALA, Alberto MARTINEZ-MARTINEZ, Miguel MATIAS-REYES, Ernesto RIOS-MARCELO, Noe RIOS-SOLIS, Erick RODRIGUEZ-AGUILAR, Juan SALAS-SUSTAITA, Abel SANCHEZ-LAGUNA, and Manuel VILLANUEVA LOPEZ,

Petitioners,

v.

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

Respondents.

Case No. 2:26-cv-2622

PETITION FOR WRIT OF HABEAS CORPUS

INDIVIDUAL ENFORCEMENT OF *RODRIGUEZ VAZQUEZ* BOND DENIAL CLASS JUDGMENT

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

FACTS

1. Petitioners 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).

2. The Bond Denial Class is comprised of "all 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*, 802 F. Supp. 3d 1297, 1336 (W.D. Wash. 2025).

3. 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)." *Id.*

4. 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.*

Ricardo Alvarado Carpio

5. Ricardo Alvarado Carpio 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 the Department of Homeland Security (DHS) on June 14, 2026, *see* Ex. A, Form I-213;

   (b) last entered the United States without inspection in or around April 2023 and was not apprehended upon arrival; and

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

6. The Department of Homeland Security (DHS) has placed Mr. Alvarado Carpio in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. A, Form I-862.

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

Cebero Bahena Bahena

7. Cebero Bahena Bahena 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 July 13, 2026, *see* Ex. B, Form I-213;

(b) last entered the United States without inspection around 2001 and was not apprehended upon arrival; and

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

8. DHS has placed Mr. Bahena Bahena in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. B, Form I-862.

Noberto Bernabe-Vega

9. Noberto Bernabe-Vega 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 July 11, 2026, *see* Ex. C, Form I-213;

(b) last entered the United States without inspection in or around September 2006 and was not apprehended upon arrival; and

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

10. DHS has placed Mr. Bernabe-Vega in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. C, Form I-862.

Jose De La Cruz Briones

11. Jose De La Cruz Briones 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 June 28, 2026, *see* Ex. D, Form I-213;

(b) last entered the United States without inspection in or around November 2015 and was not apprehended upon arrival; and

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

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

12. DHS has placed Mr. De La Cruz Briones in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. D, Form I-862.

Johnny Espinoza Romero

13. Johnny Espinoza Romero 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 June 23, 2026, *see* Ex. E, Form I-213;

(b) last entered the United States without inspection around 2021 and was not apprehended upon arrival; and

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

14. DHS has placed Mr. Espinoza Romero in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. E, Form I-862.

Gerardo Garcia Garcia

15. Gerardo Garcia Garcia 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 June 28, 2026, *see* Ex. F, Form I-213;

(b) is alleged to have entered without inspection sometime after departing the United States on September 4, 2004, and was not apprehended upon arrival;[1] and

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

16. DHS has placed Mr. Garcia Garcia in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. F, Form I-862.

Felipe Lopez-Pascual

17. Felipe Lopez-Pascual is a member of the Bond Denial Class, as he:

[1] Mr. Garcia Garcia states that he was admitted under a B2 visa when he last entered the United States, but DHS's arrest report shows "no record of GARCIA ever legally entering the United States after his departure on September 4, 2004." Ex. F, Form I-213, at 3.

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

(a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on June 28, 2026, *see* Ex. G, Form I-213;

(b) last entered the United States without inspection around 2023 and was not apprehended upon arrival; and

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

18. DHS has placed Mr. Lopez-Pascual in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. G, Form I-862.

Alejandro Lucatero-Sepulveda

19. Alejandro Lucatero-Sepulveda 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 June 29, 2026, *see* Ex. H, Form I-213;

(b) last entered the United States without inspection in or around May 2016 and was not apprehended upon arrival; and

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

20. DHS has placed Mr. Lucatero-Sepulveda in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. H, Form I-862.

Luis Marquez-Arzapala

21. Luis Marquez-Arzapala 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 June 25, 2026, *see* Ex. I, Form I-213;

(b) last entered the United States without inspection on or around January 12, 2021 and was not apprehended upon arrival; and

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

22. DHS has placed Mr. Marquez Arzapala in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. I, Form I-862.

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

Alberto Martinez-Martinez

23. Alberto Martinez-Martinez 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 June 29, 2026, *see* Ex. J, Form I-213;

(b) last entered the United States without inspection around 2008 and was not apprehended upon arrival; and

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

24. DHS has placed Mr. Martinez-Martinez in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. J, Form I-862.

Miguel Matias-Reyes

25. Miguel Matias-Reyes 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 June 25, 2026, *see* Ex. K, Form I-213;

(b) last entered the United States without inspection around 2010 and was not apprehended upon arrival; and

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

26. DHS has placed Mr. Matias-Reyes in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. K, Form I-213.

Ernesto Rios-Marcelo

27. Ernesto Rios-Marcelo 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 July 4, 2026, *see* Ex. L, Form I-213;

(b) last entered the United States without inspection around 1999 and was not apprehended upon arrival; and

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

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

28. DHS has placed Mr. Rios-Marcelo in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. L, Form I-862.

Noe Rios-Solis

29. Noe Rios-Solis 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 July 11, 2026, *see* Ex. M, Form I-213;

(b) last entered the United States without inspection in or around March 2010 and was not apprehended upon arrival; and

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

30. DHS has placed Mr. Rios-Solis in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. M, Form I-862.

Erick Rodriguez-Aguilar

31. Erick Rodriguez-Aguilar 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 June 27, 2026, *see* Ex. N, Form I-213;

(b) last entered the United States without inspection around 2000 and was not apprehended upon arrival; and

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

32. DHS has placed Mr. Rodriguez-Aguilar in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. N, Form I-862.

Juan Salas-Sustaita

33. Juan Salas-Sustaita 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 July 12, 2026, *see* Ex. O, Form I-213;

(b) last entered the United States without inspection in or around October 2002 and was not apprehended upon arrival; and

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

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

34. DHS has placed Mr. Salas-Sustaita in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. O, Form I-862.

Abel Sanchez-Laguna

35. Abel Sanchez-Laguna 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 July 10, 2026, *see* Ex. P, Form I-213;

(b) last entered the United States without inspection around 2007 and was not apprehended upon arrival; and

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

36. DHS has placed Mr. Sanchez-Laguna in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. P, Form I-862.

Manuel Villanueva Lopez

37. Manuel Villanueva Lopez 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 May 11, 2026, *see* Ex. Q, Form I-213;

(b) last entered the United States without inspection around 2007 and was not apprehended upon arrival; and

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

38. DHS has placed Mr. Villanueva Lopez in removal proceedings pursuant to 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. Q, Form I-862.

JURISDICTION AND VENUE

39. 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

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

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

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

PARTIES

41. Ricardo Alvarado Carpio is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

42. Cebero Bahena Bahena is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

43. Noberto Bernabe-Vega is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

44. Jose De La Cruz Briones is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

45. Johnny Espinoza Romero is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

46. Gerardo Garcia Garcia is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

47. Felipe Lopez-Pascual is currently detained at NWIPC. She is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

48. Alejandro Lucatero-Sepulveda is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

49. Luis Marquez-Azarpala is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

50. Alberto Martinez-Martinez is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

51. Miguel Matias-Reyes is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

52. Ernesto Rios-Marcelo is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

53. Noe Rios-Solis is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

54. Erick Rodriguez-Aguilar is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

55. Juan Salas-Sustaita is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

56. Abel Sanchez-Laguna is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

57. Manuel Villanueva Lopez is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

58. Respondent Julio Hernandez is the Acting Director for the Seattle Field Office of ICE's Enforcement and Removal Operations division. As Petitioners' immediate custodian, he is responsible for Petitioners' detention and removal. He is sued in his official capacity.

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

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

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

CLAIMS FOR RELIEF

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

Violation of the INA:
Request for Relief Pursuant to *Rodriguez Vazquez*

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

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

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

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

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

PRAYER FOR RELIEF

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

a. Assume jurisdiction over this matter;

b. Issue a writ of habeas corpus requiring that within one day, Respondents release any Petitioner with an alternative bond order unless Respondents allow for their release upon payment of the alternative bond amount and any other conditions set by the immigration judge (IJ);

c. Issue a writ of habeas corpus as to any Petitioner without an alternative bond order requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a) within fourteen days of a request from Petitioner, *specifying that this Court's order does not prohibit an IJ from granting an individual Petitioner's request for a continuance in their bond proceedings*;

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

d. Order that upon Petitioners' release, Respondents must return to each Petitioner their personal property, including any personal identification document (other than a passport) and any employment authorization document;

e. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

f. Grant any other and further relief that this Court deems just and proper.

DATED this 24th day of July, 2026.

s/ Matt Adams
Matt Adams, WSBA No. 28287
matt@nwirp.org

s/ Leila Kang
Leila Kang, WSBA No. 48048
leila@nwirp.org

s/ Amanda Ng
Amanda Ng, WSBA No. 57181
amanda@nwirp.org

s/ Kevin Hollinz
Kevin Hollinz, WSBA No. 52043
kevin@nwirp.org

Northwest Immigrant Rights Project
615 Second Avenue, Suite 400
Seattle, WA 98104
(206) 957-8611

Counsel for Petitioners

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I am submitting this verification on behalf of Petitioners because I am one of Petitioners' attorneys. I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge, information, and belief.

The factual allegations as to each Petitioner are further verified by the corresponding exhibit identified below. The Northwest Immigrant Rights Project received the documents from Respondents' counsel pursuant to *Rodriguez Vazquez v. Hermosillo*, 816 F. Supp. 3d 1234 (W.D. Wash. 2026), or obtained them from Petitioners or their immigration counsel. I certify that the attached exhibits are true and accurate copies of the following:

Ex. A. Documents for Ricardo Alvarado Carpio: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. B. Documents for Cebero Bahena Bahena: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. C. Documents for Noberto Bernabe-Vega: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. D. Documents for Jose De La Cruz Briones: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. E. Documents for Johnny Espinoza-Romero: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. F. Documents for Gerardo Garcia Garcia: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. G. Documents for Felipe Lopez-Pascual: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. H. Documents for Alejandro Lucatero-Sepulveda: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. I. Documents for Luis Marquez-Arzapala: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. J. Documents for Alberto Martinez-Martinez: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. K. Document for Miguel Matias-Reyes: DHS Form I-213, Record of Deportable/Inadmissible Alien

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
(206) 957-8611

Ex. L. Documents for Ernesto Rios-Marcelo: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. M. Documents for Noe Rios-Solis: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. N. Documents for Erick Rodriguez-Aguilar: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. O. Documents for Juan Salas-Sustaita: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. P. Documents for Abel Sanchez-Laguna: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Ex. Q. Documents for Manuel Villanueva Lopez: (1) DHS Form I-213, Record of Deportable/Inadmissible Alien; and (2) DHS Form I-862, Notice to Appear

Respectfully submitted this 24th day of July, 2026.

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