District Judge Tiffany M. Cartwright

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Ruben MENDEZ DOMINGUEZ et al..

Petitioners,

v.

Laura HERMOSILLO et al.,

Respondents.

Case No. 2:25-cv-02337-TMC

PETITIONERS' TRAVERSE

Note on Motion Calendar: December 9, 2025

Respondents offer no defense in this case, acknowledging that Petitioners are members of the Bond Denial class in *Rodriguez Vazquez v. Bostock*, No. 3:25-cv-05240-TMC, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025). Dkt. 15 at 3. Accordingly, Petitioners respectfully urge the Court to grant their petition immediately.¹

¹ As to the one Petitioner who was already denied an alternative bond as a flight risk or danger, Petitioners acknowledge that this Court's previous decisions in related cases indicate relief is not warranted unless that person first overcomes the flight risk or danger designation in an administrative appeal.

| 1 | Respectfully submitted this 8th day of December, 2025. | |
|---------------|--|---|
| 2 3 | s/ Matt Adams Matt Adams, WSBA No. 28287 matt@nwirp.org | s/ Leila Kang Leila Kang, WSBA No. 48048 leila@nwirp.org |
| 5 | s/ Glenda M. Aldana Madrid Glenda M. Aldana Madrid, WSBA No. 46987 glenda@nwirp.org | s/ Aaron Korthuis Aaron Korthuis, WSBA No. 53974 aaron@nwirp.org |
| 6 7 8 | s/ Amanda Ng Amanda Ng, WSBA No. 57181 amanda@nwirp.org | I certify that this memorandum contains 95 words, in compliance with the Local Civil Rules. |
| 9 10 11 | NORTHWEST IMMIGRANT RIGHTS PROJECT 615 Second Ave., Suite 400 Seattle, WA 98104 (206) 957-8611 | |
| 12 13 | Counsel for Petitioners | |
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