The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Naveen KUMAR, Petitioner, v. Cammilla WAMSLEY, et al., Respondents.	Case No. 2:25-cv-02055-KKE **PETITIONER'S TRAVERSE** Noting Date: November 5, 2025

INTRODUCTION

Mr. Kumar's case presents a live controversy. Respondents did not designate Uganda—a country notorious for its treatment of LGBTQ+ persons—as a country of removal until *after* a final order of removal was issued in Mr. Kumar's case—an order that also granted him protection from deportation on account of being a gay man who has the human immunodeficiency virus (HIV). Dkt. 1 ¶ 73; Dkt. 3 ¶ 6; Dkt. 10 at 3. Respondents did not advise him of any process for seeking protection from removal to Uganda and did not even schedule a

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fear screening until after he filed the instant petition. Dkt. 3 ¶ 10; Dkt. 10-1 ¶¶ 14–15. Respondents have also not confirmed what will occur after that screening takes place. *See* Dkt. 10 at 3. As such, there is much for the Court to review in assessing Mr. Kumar's habeas petition. Additionally, Mr. Kumar's membership in the certified class in *D.V.D. v. DHS*, No. 1:25-cv-10676-BEM (D. Mass.), is no bar to this Court's jurisdiction here, as this petition raises claims for relief that are not encompassed by *D.V.D.*, especially given the stay of the preliminary injunction in that case. The Court should thus exercise its jurisdiction here and grant Mr. Kumar's petition given Respondents' unconstitutional processes and the very serious harm Mr. Kumar faces if removed to Uganda or another country where being gay or HIV positive is dangerous.

ARGUMENT

I. Mr. Kumar's petition is not moot.

Respondents' arguments that Mr. Kumar's petition is moot are without merit.

As an initial matter, Respondents' recitation of the facts neglects to acknowledge that they scheduled Mr. Kumar for a reasonable fear interview (RFI) only *after* he filed the instant petition. *Compare* Dkt. 10 at 3, *with* Dkt. 10-1 ¶¶ 14–16. They thus err in contending that there is no basis for the habeas petition.

Moreover, this Court has much to address beyond Mr. Kumar's right to an RFI. The crux of Mr. Kumar's petition is that Respondents' policy for executing third-country removals violates his right to procedural due process as well as his statutory rights to be protected from removal to a country where he will likely be persecuted or tortured. *See* Dkt. 1 ¶¶ 82–95. Specifically, Mr. Kumar alleges that Respondents' "notice" is not meaningful because it contains no information

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about a planned date of removal or about whether and how someone may raise a fear-based claim for protection. *Id.* ¶ 88. There is no requirement that notice be provided with sufficient time to allow a noncitizen to investigate the planned country of removal and adequately prepare to meet the exacting standard of the RFI. *Id.* There is also no requirement that it be served on an individual's attorney, despite the regulatory mandate establishing that it must be. *Id.* ¶ 89. And it does not require that Respondents inquire as to an individual's fear of removal to the third country. *Id.* ¶ 90.

Additionally, the RFI, when provided, does not afford "a meaningful opportunity to be heard," for it requires that a noncitizen "demonstrate full entitlement to withholding or [Convention Against Torture] protection," often hours after first learning of the possibility of removal to that third country. *Id.* ¶ 95. To demonstrate full entitlement, an individual must show they are "more likely than not" to be persecuted or tortured in a given country. *Id.* ¶ 51; *see also* Dkt. 10 at 3 (explaining Mr. Kumar's RFI will assess "whether it is more likely than not he will be persecuted on a statutorily protected ground or tortured in Uganda"). By contrast, regulatory RFIs that screen for withholding of removal and CAT claims require that individuals demonstrate there is a "reasonable possibility" of torture or persecution, Dkt. 1 ¶ 52; 8 C.F.R. § 208.31(c), which is a lower standard of proof, Dkt. 1 ¶ 53. This distinction matters because in proceedings before the immigration court where individuals *are* required to demonstrate that persecution or torture is "more likely than not," a successful application "often includes hundreds of pages of documentation" including country conditions evidence and testimony from them, witnesses, and experts. *Id.* ¶ 95. Expecting a noncitizen to produce anything akin to that on a few hours'—or

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even days'—notice is insufficient "to reasonably be able to contact counsel, file . . . , and pursue appropriate relief." *Id.* (quoting *A.A.R.P. v. Trump*, 605 U.S. 91, 95 (2025) (per curiam)).

Mr. Kumar also seeks other procedural protections. *See* Dkt. 1 at 22–23. For example, Respondents' policy establishes that if Mr. Kumar passes his RFI, they "may" move to reopen his removal proceedings with the immigration court. Dkt. 4-1 at 2. Mr. Kumar requests that they be required to so. Dkt. 1 at 22. This is because Mr. Kumar may only file one motion to reopen as of right within 90 days of the entry of his final removal order. 8 C.F.R. § 1003.23(b)(1). He is not entitled to file a new motion every time Respondents provide him a notice of third-country removal. Respondents, however, are not limited in the number of motions to reopen they may file in any noncitizen's case. *Id.* Respondents' policy also does not require them to provide Mr. Kumar any information regarding what options *he* may have (or if he even has any) to pursue protection from removal regarding the third country, including information regarding what steps to take to present his claim before the immigration court. *See* Dk. 4-1 at 2; 4-2 at 2. Finally, Respondents' policy does not provide any path to administrative and judicial review of a negative RFI. *See* Dkt. 4-1 at 2 (explaining noncitizen "will be removed" if they do not pass the RFI). Accordingly, there are plenty of "due process violations [that] exist [in Respondents' policy] that this Court could address." Dkt. 10 at 6.[1]

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[1] Further, Mr. Kumar's concerns regarding Respondents' use of diplomatic assurances, *see* Dkt. 1 ¶¶ 91–94, may come into play if Respondents try to remove him to a different third country.

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Respondents claim that Mr. Kumar has received sufficient process because they scheduled his RFI more than two months after providing him the initial notice of intent of removal. *See* Dkt. 10 at 7. However, this initial "notice" was inadequate because it did not instruct him whether he could contest that intended removal and how to do so, much less provide him with any timeline for submitting a request for protection. *See* Dkt. 4-6; Dkt. 3 ¶ 10. Accordingly, it did not afford him a meaningful opportunity to prepare for an RFI, as he was never advised that there *would* be such a screening, what it would entail, or that it was even a possibility. *See Aden v. Nielsen*, 409 F. Supp. 3d 998, 1010 (W.D. Wash. 2019) (explaining that "Ninth Circuit case law suggests that" government's failure to "notif[y] petitioner that he had a right to apply for asylum or withholding of deportation to Somalia despite his earlier objections to deportation to that country" "in and of itself, is also a violation of the constitutional right to due process"). Moreover, because nothing prevents Respondents from designating another third country if Mr. Kumar passes his RFI to Uganda, Dkt. 10 at 6, there is no guarantee that he will not be given a similarly deficient notice in the future. This Court's involvement is therefore crucial to ensuring any notice is provided with enough time and includes sufficient information to afford him a meaningful opportunity to be heard as to any fear of removal.

Second, Respondents allege that Mr. Kumar has "inexplicably chosen not to" file a motion to reopen with the immigration court. Dkt. 10 at 7. However, their own policy implies that the agency will file such a motion if the noncitizen passes the RFI. *See* Dkt. 4-1 at 2. They also cite to the wrong reopening provision. *See* Dkt. 10 at 6, 7 (citing 8 C.F.R. § 1003.23(b)(4)(i)). That provision sets no numerical or temporal limitations on someone's ability to file a motion to reopen to request fear-based protection from removal if that request "is

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based on changed country conditions *arising in the country of nationality or the country to which removal has been ordered*." 8 C.F.R. § 1003.23(b)(4)(i) (emphasis added). Here, however, Mr. Kumar fears removal to a third country, which means less generous rules apply: he may only file one motion to reopen within 90 days of his final removal order. 8 C.F.R. § 1003.23(b)(1). He only gets one bite at the apple, whereas Respondents may simply decide to remove him to a different third country if the court grants his motion to reopen with respect to Uganda. There is no guarantee, moreover, that the immigration court will grant a motion to reopen based on feared removal to a third country, especially where that motion does not specify fear to a specific country or is more open-ended. *See* Aldana Madrid Decl., Ex. A (immigration judge denial of motion to reopen for feared third-country removal, explaining the court "is not persuaded that an individual granted withholding of removal is entitled to a potentially endless series of applications and full hearings before immigration judges with respect to a fear of torture in any and all potential alternate or third countries for removal"). Mr. Kumar's failure to file a motion to reopen at this juncture is thus not "inexplicabl[e]." Dkt. 10 at 7.

Moreover, Respondents' suggestion that the *potential* availability of reopening is a procedural protection in these circumstances has been previously rejected by this Court. *See Aden*, 409 F. Supp. 3d at 1010 ("Giving petitioner an opportunity to file a motion to reopen – a motion which seeks discretionary relief that may be denied without any sort of hearing – is not an adequate substitute for the process that is due in these circumstances."); *Nguyen v. Scott*, No. 2:25-CV-01398, 2025 WL 2419288, at *18 (W.D. Wash. Aug. 21, 2025) (declaring that due process and the government's statutory obligations require "the removal proceedings [to] be

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reopened so that a hearing can be held"); *Baltodano v. Bondi*, No. C25-1958RSL, 2025 WL 2987766, at *3 (W.D. Wash. Oct. 23, 2025) (similar).

Finally, Respondents argue "any allegation" of future injury "is entirely speculative." Dkt. 10 at 7. To the contrary, Mr. Kumar's fear of being sent to a third country is very real: Respondents have advised that he will be removed to Uganda, a country infamous for its mistreatment of LTGBQ+ persons. Dkt. 3 ¶¶ 10, 12; Dkt. 4-6; Dkt. 1 ¶¶ 80–81. It is frankly outrageous that Respondents would designate Uganda as a country of removal for an individual who was granted protection from removal to his native country because of the persecution he faces due to his sexual orientation and HIV positive status.

What is more, Respondents have recently sent scores of noncitizens to third countries where they have been held in custody under oppressive conditions, sometimes for an indefinite period, or sent back to their countries of origin despite having won protection from removal to those very countries. *See, e.g.*, Edward Acquah, et al., *Immigrants deported from U.S. to Ghana are sent home, where lawyers say some could face torture*, PBS (Sept. 15, 2025), https://www.pbs.org/newshour/world/immigrants-deported-from-u-s-to-ghana-are-sent-home-where-lawyers-say-some-could-face-torture (reporting that five men who had won protection from deportation to their home countries were sent to those countries by the Ghanaian government upon being deported there); Amnesty International, *South Sudan: End four deportees' arbitrary detention* (Sept. 18, 2025), https://www.amnesty.org/en/documents/afr65/0280/2025/en/ (explaining that since their arrival to South Sudan more than two months prior, the men had been in custody "in an undisclosed location"); Gerald Imray, *Men Deported by U.S. to Eswatini in Africa Will Be Held in Solitary Confinement for Undetermined Time*, PBS (Jul. 18, 2025),

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https://www.pbs.org/newshour/politics/men-deported-by-u-s-to-eswatini-in-africa-will-be-held-in-solitary-confinement-for-undetermined-time. The threat of deportation to Uganda is particularly troubling given that Mr. Kumar is gay and HIV positive, while Uganda is notoriously anti-LGBTQ+ and has been hard hit by cuts to aid programs serving HIV positive populations. *See* Dkt. 1 ¶¶ 80–81 (quoting Human Rights Watch report that Ugandan government has taken "crackdowns and discrimination against LGBT people" "to unprecedented heights"). Thus, unlike the hypothetical feared future harms in *Spencer v. Kemna*, 523 U.S. 1, 14–16 (1998), the prospect of removal to a country where Mr. Kumar's life or freedom would be threatened is not at all speculative, and Respondents' assertion to the contrary is patently offensive. *See Y.T.D. v. Andrews*, No. 1:25-CV-01100-JLT-SKO, 2025 WL 2675760, at *11 (E.D. Cal. Sept. 18, 2025) (acknowledging "numerous examples of cases involving individuals who DHS has attempted to remove to third countries with little or no notice or opportunity to be heard" before concluding petitioner had demonstrated "a sufficiently imminent risk [of being] subjected to improper process in relation to any third country removal").

Further, the threat of removal without adequate procedural protections is also very real for Mr. Kumar, for Respondents have not disavowed their constitutionally deficient third-country removal policy, Dkt. 1 ¶¶ 48–64 (detailing Respondents' policy), nor suggested they would not apply it to Mr. Kumar, *see generally* Dkt. 10; *see also Salim Nizar Esmail v. Noem*, No. 2:25-CV-08325-WLH-RAO, 2025 WL 3030589, at *5 (C.D. Cal. Sept. 26, 2025) (concluding petitioner satisfied standing to challenge possible third-country removal because "[t]he fact that [the feared violation of his constitutional right to due process] is directly traceable to a written policy" to which he, "as a noncitizen with a removal order . . . is, therefore, inherently subject …

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sufficiently demonstrate[s] that he is realistically threatened by a repetition of the violation" (citation modified)).

Mr. Kumar's case thus presents a controversy that necessities the Court's intervention.

II. *D.V.D. v. DHS* is not an impediment to Mr. Kumar's request for protection.

Respondents err in arguing that the Supreme Court's stay of the preliminary injunction in *D.V.D.* prevents Mr. Kumar from seeking relief through an individual habeas petition.

Respondents first argue the injunction ruling "is both precedent and . . . binding" on Mr. Kumar as a class member. Dkt. 10 at 8. But the Court's order stayed *classwide* preliminary injunctive relief with respect to procedural protections permitting class members to raise CAT claims. *See D.V.D. v. DHS*, 145 S. Ct. 2153, 2153 (2025) (Mem.); *id.* at 2156 (Sotomayor, J., dissenting) (explaining the preliminary injunction "require[d] the Government to provide noncitizens with . . . a meaningful opportunity to raise a claim under the Convention [Against Torture]"); *see also D.V.D. v. DHS*, 778 F. Supp. 3d 355, 392 (D. Mass. 2025), *clarified*, 2025 WL 1323697 (May 7, 2025), and 2025 WL 1453640 (May 21, 2025). Notably, the Court did not provide a rationale, nor purport to issue an order on the merits of the claims or about an individual's entitlement to the protections sought. *See* 145 S. Ct. at 2153 (stating simply the stay request was "granted").

For this reason, courts have rejected efforts by Respondents to use the stay order to deny a habeas petitioner's claims:

> This Court cannot ascertain from the Supreme Court's emergency order whether it found the government likely to succeed on its jurisdictional or substantive claims. This distinction is especially important in this case, where one of the government's primary arguments—that the *D.V.D.* court had no power to enter *classwide* injunctive relief—would have no bearing on the merits of individual

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habeas petitions.

Nguyen, 2025 WL 2419288, at *22–23; *see also, e.g.*, *Sagastizado v. Noem*, No. 5:25-CV-00104, 2025 WL 2957002, at *13 (S.D. Tex. Oct. 2, 2025) (explaining that "[i]n another case where the Supreme Court stayed a district court's preliminary injunction without an analysis of the merits, Justice Kavanaugh emphasized that the stay order is not a ruling on the merits. . . . Therefore, reading into the Supreme Court's stay is an inherently speculative endeavor. Without clearer direction, the Court will not deny relief this Court deems likely meritorious simply because the class-wide injunction was stayed" (citation modified)); *id.* at *7 ("[R]es judicata requires a final judgment on the merits in order to preclude a later suit."). The Supreme Court's order therefore does not require dismissal of Mr. Kumar's petition.

Second, the preliminary injunction the Supreme Court stayed did not afford "essentially the same process that [Mr.] Kumar asks the Court to order here," Dkt. 10 at 8, for while there is overlap between the *D.V.D.* injunction and the protections Mr. Kumar seeks, there are crucial differences, as this Court has recently recognized. *See Nguyen*, 2025 WL 2419288, at *20–21; *J.R. v. Bostock*, No. 2:25-CV-01161-JNW, 2025 WL 1810210, at *3 n.2 (W.D. Wash. June 30, 2025).

First, the *D.V.D.* preliminary injunction concerned class-wide, "systemic relief," not individual relief. *Nguyen*, 2025 WL 2419288, at *21; *see also J.R.*, 2025 WL 1810210, at *3 n.2 ("This case does not involve universal injunctive relief, instead it is limited to the sole plaintiff, J.R."). The order did not in any way indicate the individuals should be unable to obtain injunctive relief. To the contrary, Defendants in *D.V.D.* repeatedly argued that 8 U.S.C. § 1252(f)(1) prevents a district court from providing classwide injunctive relief; but that very

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statute expressly allows injunctive relief on behalf of individuals. *See* 8 U.S.C. § 1252(f)(1) (permitting injunction "with respect to . . . an individual"); *see also D.V.D.*, 145 S. Ct. at 2160 (Sotomayor, J., dissenting) (clarifying that § 1252(f)(1) "undisputedly does not affect the District Court's authority to grant relief to the individual plaintiffs here; it affects only the classwide injunction").[2]

Second, the *D.V.D.* preliminary injunction only afforded the opportunity to seek protection under CAT, and did not address the separate statutory protection of withholding of removal under the Immigration and Nationality Act (INA). *D.V.D.*, 778 F. Supp. 3d at 392–93; *see Sagastizado*, 2025 WL 2957002, at *8 (deciding to hear individual petitioner's request for immigration judge review of a negative RFI prior to third-country removal because, inter alia, "relief for [him] here is distinguishable in part from *D.V.D.* because plaintiffs there did not seek class-wide injunctive relief with respect to future claims for withholding of removal").

Accordingly, Respondents' authorities showing that "courts recognize that members of class action lawsuits should not be permitted to bring separate actions where they seek to re-litigate individually issues that were raised in the class action," Dkt. 10 at 8, are inapposite. In analyzing its holdings in *Crawford v. Bell*, 599 F.2d 890 (9th Cir. 1979), *Krug v. Lutz*, 329 F.3d

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[2] Notably, Judge Cartwright found that "[t]he contradiction in [Respondents'] arguments" in that case and in *D.V.D.*—namely, arguing in the latter "that injunctive relief cannot be granted to the class, and may only be pursued (if at all) through individual cases, while arguing [in the former] that Petitioner's individual claim should be barred because his injunctive claims should be adjudicated as part of the *D.V.D.* class"—"further undermine[d] Respondents' position" urging for dismissal of the individual petition given the *D.V.D.* class certification. *Nguyen*, 2025 WL 2419288, at *21.

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692 (9th Cir. 2003), and *Frost v. Symington*, 197 F.3d 348 (9th Cir. 1999), the Ninth Circuit in *Pride v. Correa* left clear that a district court "may not dismiss those allegations of the complaint which go beyond the allegations and relief prayed for in the class action." 719 F.3d 1130, 1133–34 (9th Cir. 2013) (citation modified).[3] As Judge Cartwright recognized in *Nguyen* when reviewing the petitioner's challenge to third-country removal despite *D.V.D.*, *Pride* explained that "individual claims for injunctive relief related to" the same subject matter as that involved in class litigation seeking "systemic reform" were "discrete" and "not duplicative," and so could be brought independently of the class litigation. *Nguyen*, 2025 WL 2419288, at *20–21 (citation modified).

Dismissal would render Mr. Kumar, who presents a meritorious claim, "powerless to petition the courts for redress of the violation until" the *D.V.D.* litigation is "fully resolved," resulting in "unwarranted delay." *Pride*, 719 F.3d at 1137. Here, that delay could have devastating and dangerous consequences given Mr. Kumar's vulnerabilities as a gay man who is HIV positive facing removal to Uganda or another third country. As another court recently declared in declining to dismiss an individual's habeas petition due to his membership in the

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[3] The Ninth Circuit also explained that dismissal was permitted, but not required, for claims that were "duplicative" of those brought in class action litigation. *Pride*, 719 F.3d at 1137 n.10. Here, none of the claims are duplicative, as Mr. Kumar seeks only individual relief. But even if that were not a sufficient distinguishing factor, the court should choose to exercise its jurisdiction as to any duplicative claims given the stakes at issue and the fact that *D.V.D.* may not be resolved until after Mr. Kumar suffers the threatened harm. *See Sagastizado*, 2025 WL 2957002, at *8 (finding "compelling circumstances" to consider petitioner's claims because "later relief in *D.V.D.* will not prevent [him] from being removed to Mexico without due process in the meantime").

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D.V.D. class, it is "counterintuitive that non-opt-out class membership, for the purposes of granting a preliminary injunction to prevent removal without due process, could prevent individuals from making their own claims for due process while that injunction is stayed on a class-wide basis." *Sagastizado*, 2025 WL 2957002, at *8.

As dismissal of this petition would be contrary to Ninth Circuit law and inappropriate given the stakes, the Court should decide the merits of Mr. Kumar's claims.

III. Mr. Kumar is entitled to the requested procedural protections.

Critically, Respondents do not challenge Mr. Kumar's argument that their third-country removal policy violates his rights under the INA, the Foreign Affairs Reform Restructuring Act of 1998 (FARRA), and the Fifth Amendment's Due Process Clause. *Compare* Dkt. 1 ¶¶ 82–107, *with* Dkt. 10. And, in fact, "[c]ourts in this district have recently found that challenges to [Respondents'] policy on third country removals are likely to succeed on the merits." *Baltodano*, 2025 WL 2987766, at *2 (citing *Nguyen*, 2025 WL 2419288 at *19; *J.R.*, 2025 WL 1810210, at *3; *Phetsadakone v. Scott*, No. 2:25-CV-01678-JNW, 2025 WL 2579569, at *4 (W.D. Wash. Sept. 5, 2025); and *Phaymany v. Northwest Immigration and Customs Enforcement Processing Center*, 2:25-cv-00854-RAJ-MLP (W.D. Wash. Sept. 25, 2025), Dkt. 22 at *5); *cf. Aden*, 409 F. Supp. 3d at 1009–11 (declaring "[a] noncitizen must be given sufficient notice of a country of deportation that, given his capacities and circumstances, he would have a reasonable opportunity to raise and pursue his claim for withholding of deportation" and ordering that noncitizen be permitted to apply for asylum, withholding of removal, and CAT protection before the immigration court prior to third-country removal).

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Courts elsewhere in the Ninth Circuit have also agreed. *See, e.g.*, *Salim Nizar Esmail*, 2025 WL 3030589, at *6–7 (explaining, inter alia, that "[i]n the context of country of removal designations, last minute orders of removal to a country may violate due process if an immigrant was not provided an opportunity to address his fear of persecution in that country" and Respondents' third-country removal policy raised due process concerns regardless of whether a third country had offered diplomatic assurances (citation omitted)); *Nadari v. Bondi*, No. 2:25-CV-07893-JLS-BFM, 2025 WL 2934514, at *3 (C.D. Cal. Sept. 3, 2025) (concluding that petitioner "established a likelihood of success on the merits, or at least the presence of 'serious questions going to the merits' as to th[e] claim" that a third-country removal "without notice and an opportunity to be heard would be unlawful"); *Y.T.D.*, 2025 WL 2675760, at *8–11 (similar).

Respondents' removal of Mr. Kumar to Uganda, or to any other third country, without meaningful notice or an opportunity to be heard on a claim of fear of persecution or torture there would violate the INA and FARRA's protections against removal to a country where a noncitizen would face persecution or torture. *See* 8 U.S.C. § 1231(b)(3)(A); Pub. L. 105-277 Div. G, Title XXII, § 2242(a), 112 Stat. 2681, 2681–822 (1999) (codified as § 1231 statutory note); *see also* 8 C.F.R. §§ 208.16–208.18, 1208.16–1208.18. It would also violate his due process rights, for "[t]he fundamental requisite of due process of law is the opportunity to be heard," which includes "timely and adequate notice." *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) (citation modified). In the immigration context, that means "no person shall be removed from the United States without opportunity, at some time, to be heard." *A.A.R.P.*, 605 U.S. at 94 (citation modified). It also means that failing to timely inform a noncitizen that they may need to seek protection from removal to a country different than the designated one

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"violate[s] a basic tenet of constitutional due process: that individuals whose rights are being determined are entitled to notice of the issues to be adjudicated, so that they will have the opportunity to prepare and present relevant arguments and evidence." *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999). Accordingly, Respondents' third-country removal policy is unlawful and Mr. Kumar is entitled to procedural protections ensuring he will have both meaningful notice *and* an opportunity to be heard as to any fear of persecution or torture in Uganda or any other third country. *See* Dkt. 1 at 21–23.

CONCLUSION

The Court should thus grant Mr. Kumar's petition.

Respectfully submitted this 4th day of November, 2025.

s/ Glenda M. Aldana Madrid
Glenda M. Aldana Madrid, WSBA No. 46987
glenda@nwirp.org

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

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

s/ Aaron Korthuis
Aaron Korthuis, WSBA No. 53974
aaron@nwirp.org

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615 Second Ave., Suite 400
Seattle, WA 98104
(206) 957-8611
Counsel for Petitioner

I certify this motion contains 4195 words in compliance with the Local Civil Rules.