District Judge Lauren King

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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ABDERRAHIM BELQASIM,

Petitioner,

v.

LAURA HERMOSILLO,¹ et al.,

Respondents.

Case No. 2:25-cv-1282-LK

FEDERAL RESPONDENTS' OBJECTION TO THE MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION

Noted for consideration: November 12, 2025

While Federal Respondents do not overall agree with the findings and recommendations in the Report and Recommendation ("R&R") (Dkt. No. 17), Federal Respondents object only to the R&R's recommendation that the Government be required to hold a bond hearing within 7 calendar days. R&R, at 28. Federal Respondents request that this Court allow the Government at least 14 days to hold a bond hearing. As demonstrated throughout the briefing, the immigration court has had difficulty obtaining an appropriate interpreter in the specific language and dialect spoken by Petitioner. Thus, the additional time would allow the Government to request and ensure that an appropriate interpreter is present at the hearing. Moreover, a 14-day time frame is consistent with what a court in this District recently issued order in a habeas case presenting similar

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Federal Respondents substitute Acting Field Office Director Laura Hermosillo for Cammilla Wamsley.

1	interpreter issues as here. Cardozo v. Bostock, No. 2:25-cv-00871-TMC, 2025 WL 2592275, at
2	*2 (W.D. Wash. Sept. 8, 2025) (stating that "courts in this district typically require that bond
3	hearings ordered as part of a conditional writ of habeas corpus occur within 14 to 30 days").
4	Accordingly, this Court should not adopt the R&R's recommendation that a court-ordered
5	bond hearing be held within 7 days. Instead, Federal Respondents ask that the Government be
6	given 14 days to comply with an order for a bond hearing.
7	DATED this 10th day of November, 2025.
8	Respectfully submitted,
9	CHARLES NEIL FLOYD
	United States Attorney
11 12	s/ Michelle R. Lambert
13	MICHELLE R. LAMBERT, NY# 4666657 Assistant United States Attorney
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14	Tacoma, Washington 98402
15	Phone: 253-428-3824 Email: michelle.lambert@usdoj.gov
16	Attorneys for Federal Respondents
17	I certify that this memorandum contains 217 words,
18	in compliance with the Local Civil Rules.
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28	FEDERAL RESPONDENTS' OBJECTION UNITED STATES ATTORNEY