District Judge Lauren King Chief Magistrate Judge Theresa L. Fricke

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

Abderrahim BELQASIM,

Case No. 2:25-cv-01282-LK-TLF

Petitioner,

PETITIONER'S RESPONSE TO **RESPONDENTS' OBJECTIONS** 

v.

Cammilla WAMSLEY, et al.,

Note on Motion Calendar: November 12, 2025

Respondents.

On October 28, 2025, Chief Magistrate Judge Theresa Fricke recommended that

Petitioner Abderrahim Belgasim received a bond hearing before an immigration judge (IJ) where

Immigration and Customs Enforcement be required to prove by clear and convincing evidence

that Mr. Belqasim is a flight risk or danger to the community. Dkt. 17. Respondents have not

filed substantive objections to the report and recommendation (R&R), and instead request that

they be provided fourteen days to schedule the bond hearing, instead of seven. See Dkt. 18. The

Court should reject that request, adopt the R&R, and order a hearing within seven days. Given

that Defendants have not filed any substantive objections to the R&R, they are already aware of

their upcoming obligation to schedule an interpreter for a bond hearing. Thus, they have already

14

1

2

3

4

5

6

7

8

9

10

11

12

13

15

17

16

18

19

20

21

22

23 24

> PET'R'S. RESP. TO RESP'TS' OBJS. - 1 Case No. 2:25-cv-01282-LK-TLF

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

had two weeks (since the date of the R&R) to begin those preparations, in addition to the seven 1 2 days laid out in the R&R from the date of this Court's forthcoming order. 3 For these reasons, Petitioner asks that the Court adopt the R&R in full at the earliest available opportunity. 4 5 Dated this 11th of November, 2025. 6 s/Matt Adams s/Leila Kang Matt Adams, WSBA 28287 Leila Kang, WSBA 48048 7 matt@nwirp.org leila@nwirp.org 8 s/Glenda M. Aldana Madrid s/Aaron Korthuis 9 Glenda M. Aldana Madrid, WSBA 46987 Aaron Korthuis, WSBA 53974 glenda@nwirp.org aaron@nwirp.org 10 Northwest Immigrant Rights Project 11 615 Second Ave., Ste 400 Seattle, WA 98104 12 (206) 957-8611 13|| Attorneys for Petitioner WORD COUNT CERTIFICATION 14 Pursuant to Local Civil Rule 7, I certify that the foregoing response has 181 words and 15 complies with the word limit requirements of Local Civil Rule 7(e). 16 s/ Aaron Korthuis 17 Aaron Korthuis, WSBA No. 53974 NORTHWEST IMMIGRANT RIGHTS PROJECT 18 615 Second Avenue, Suite 400 Seattle, WA 98104 19 (206) 816-3872 aaron@nwirp.org 20 21 22 23 24

PET'R'S. RESP. TO RESP'TS' OBJS. - 2 Case No. 2:25-cv-01282-LK-TLF