

The Honorable John H. Chun
The Honorable Brian A. Tsuchida

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

MOHIT KUMAR,

Petitioner,

v.

CAMILLA WAMSLEY, *et al.*,

Respondents.

Case No. 2:25-cv-01772-JHC-BAT

**FEDERAL RESPONDENTS' REPLY IN
SUPPORT OF RETURN MEMORANDUM
AND MOTION TO DISMISS**

As laid out in the return memorandum and motion to dismiss, Kumar received all process to which he was constitutionally entitled when immigration officials determined that his release should be revoked under 8 C.F.R. 236.1(c)(9) and notified him of the revocation, including the reasons for the decision. Even assuming that the factors laid out in *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976), apply, Kumar received the basic guarantees of due process—an individualized determination, notice of the reason for the revocation, and an opportunity to respond—which is all that should be required when weighing Kumar's limited liberty interest against the government's interest in effective and timely resolution of immigration proceedings. Accordingly, the Court should deny Kumar's petition and dismiss this matter.

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1 DATED this 14th day of October, 2025.

2 Respectfully submitted,

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13 *I certify that this memorandum contains 123 words,*
14 *in compliance with the Local Civil Rules.*

15 *Attorneys for Federal Respondents*