

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Dominguez-Ruiz v. Noem

No. 2:26-cv-00189-TMC (W.D. Wash. Jan. 27, 2026) · No. 2:26-cv-00189-TMC · Decided January 27, 2026

SUMMARY

The United States District Court for the Western District of Washington denied Amady Lazaro Dominguez-Ruiz’s motion for a temporary restraining order seeking immediate release from immigration detention and preventing his transfer. The court held that he had not shown a likelihood of irreparable harm because the habeas petition was already scheduled for prompt consideration and no facts indicated that a transfer was likely. The court noted that an existing scheduling order required advance notice before transfer or removal.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Tiffany M. Cartwright
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 27, 2026
DOCKET	2:26-cv-00189-TMC
DISPOSITION	denied
PROCEDURAL POSTURE	Petitioner moved for a temporary restraining order seeking immediate release from immigration detention and an order preventing respondents from transferring him out of the Western District of Washington. The court denied the motion.
STANDARD OF REVIEW	A party seeking a TRO must establish a likelihood of success on the merits, a likelihood of irreparable harm absent preliminary relief, that the balance of equities favors relief, and that an injunction is in the public interest. Under the Ninth Circuit's alternative serious-questions test, the party must show serious questions going to the merits, a sharply tipping balance of hardships, likely irreparable injury, and that the injunction is in the public interest. When the government is the opposing party, the balance-of-equities and public-interest factors merge.
PRECEDENTIAL VALUE	district court opinion; precedential status not specified

PARTIES

Amady Lazaro Dominguez-Ruiz v. Kristi Noem, et al.

TOPICS

immigration detention

injunctions

removal proceedings

due process

immigration

PRACTICE AREAS

immigration

immigration detention

civil procedure

injunctive relief

QUESTIONS PRESENTED

1. Whether petitioner established the requirements for a temporary restraining order, particularly a likelihood of irreparable harm before adjudication of his habeas petition.
2. Whether petitioner was entitled to immediate release from immigration detention or additional transfer-related relief pending resolution of the habeas petition.

HOLDINGS

1. Petitioner was not entitled to a temporary restraining order because he failed to show a likelihood of irreparable harm in the absence of preliminary relief.
2. Petitioner was not entitled to additional transfer-related protections because he offered no evidence that transfer was likely, and the court's scheduling order already required at least 48 hours' notice before transfer or removal.

KEY QUOTATIONS

“A party seeking a TRO “must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest.”” (at 2)

“Motions for temporary restraining orders should be reserved for matters where the petitioner alleges imminent, irreparable harm, such as imminent removal from the United States.” (at 3)

FACTUAL BACKGROUND

Amady Lazaro Dominguez-Ruiz, a Cuban citizen, entered the United States on May 17, 2022, was briefly detained, and was released after receiving a notice to appear. After an immigration judge dismissed his proceedings and placed him in expedited removal on May 27, 2025, he was re-detained and held at the Northwest Immigration and Customs Enforcement Processing Center. He alleged that his continued detention caused loss of physical liberty and economic harm from lost work, but offered no facts showing that those harms would intensify before the court decided his habeas petition or that a transfer was likely.

PROCEDURAL HISTORY

Petitioner filed a petition for a writ of habeas corpus on January 18, 2026, alleging that his immigration detention violated due process and the Immigration and Nationality Act. The court then issued a scheduling

order requiring advance notice of any transfer or removal. Petitioner filed the TRO motion on January 27, 2026; the court denied it because he failed to establish likely irreparable harm before the court would decide the habeas petition on the merits.

DISPOSITION

denied

CASES CITED

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008)
- United States v. City of Seattle, 474 F. Supp. 3d 1181, 1185-87 (W.D. Wash. 2020)
- Drakes Bay Oyster Co. v. Jewell, 747 F.3d 1073, 1092 (9th Cir. 2014)
- Fraihat v. U.S. Immigration & Customs Enforcement, 16 F.4th 613, 635 (9th Cir. 2021)
- Alliance for the Wild Rockies v. Cottrell, 632 F.3d 1127, 1135 (9th Cir. 2011)