

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Uriel Mendoza Araiza v. Laura Hermosillo, Seattle Field Office
Director, Enforcement and Removal Operations, U.S. Immigration
and Customs Enforcement (Acting), et al.

Case No. 2:25-cv-02139-TL (W.D. Wash. Dec. 8, 2025) · No. 2:25-cv-02139-TL · Decided December 8, 2025

SUMMARY

The United States District Court for the Western District of Washington granted Uriel Mendoza Araiza’s petition for a writ of habeas corpus challenging his immigration detention. The court treated him as a member of the Bond Denial Class identified in Rodriguez Vazquez v. Bostock and concluded that he was detained under 8 U.S.C. § 1226(a), rather than subject to mandatory detention under §§ 1225(b)(2) or 1226(c). The court ordered his release unless respondents conducted a bond hearing under § 1226(a) within seven days.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Tana Lin
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 8, 2025
DOCKET	2:25-cv-02139-TL
DISPOSITION	granted
PROCEDURAL POSTURE	Petitioner sought a writ of habeas corpus under 28 U.S.C. § 2241 challenging his mandatory immigration detention. After briefing, the district court granted the petition and ordered release unless Respondents provided a bond hearing under 8 U.S.C. § 1226(a).
STANDARD OF REVIEW	A habeas petitioner must establish by a preponderance of the evidence that he is in custody in violation of the Constitution or laws or treaties of the United States.
PRECEDENTIAL VALUE	unpublished district court opinion

PARTIES

Uriel Mendoza Araiza v. Laura Hermosillo, Seattle Field Office
Director, Enforcement and Removal Operations, U.S. Immigration and
Customs Enforcement (Acting), et al.

TOPICS

federal habeas corpus

immigration detention

removal proceedings

statutory interpretation

immigration

PRACTICE AREAS

immigration detention

federal habeas corpus

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QUESTIONS PRESENTED

1. Whether the Laken Riley Act applies retroactively to Petitioner's 2006 shoplifting conviction.
2. Whether Petitioner is a member of the Bond Denial Class defined in *Rodriguez Vazquez v. Bostock*.
3. Whether Petitioner is detained in violation of the Immigration and Nationality Act and is entitled to a bond redetermination hearing under 8 U.S.C. § 1226(a).

HOLDINGS

1. Because Respondents agreed that Petitioner was a member of the Rodriguez Vazquez Bond Denial Class, the court treated Respondents as having conceded that the Laken Riley Act did not apply to Petitioner or his 2006 conviction.
2. Petitioner was detained under 8 U.S.C. § 1226(a) and was not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).

KEY QUOTATIONS

“Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2). The Court further declares that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” (at 4)

FACTUAL BACKGROUND

Uriel Mendoza Araiza, a native and citizen of Mexico, entered the United States without inspection more than twenty years before the proceedings and had no lawful immigration status. ICE apprehended him in Washington on September 29, 2025, and DHS charged him as inadmissible for entering without inspection. An immigration judge denied bond based on mandatory-detention provisions, relying in part on Araiza's 2006 California shoplifting conviction.

PROCEDURAL HISTORY

ICE apprehended Petitioner on September 29, 2025, and placed him in removal proceedings as inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i). An immigration judge denied bond for lack of jurisdiction, concluding that

Petitioner was subject to mandatory detention under 8 U.S.C. §§ 1225(b)(2)(A) and 1226(c)(1)(E), as amended by the Laken Riley Act, based on his 2006 shoplifting conviction. Petitioner filed this habeas action on October 30, 2025; the petition became ripe on November 24, 2025, and the court granted relief on December 8, 2025.

DISPOSITION

granted

REMAND INSTRUCTIONS

Respondents must release Petitioner unless they administer a bond hearing under 8 U.S.C. § 1226(a) within seven days of the order. At the hearing, Respondents may not conclude or argue that 8 U.S.C. §§ 1226(c) or 1225(b)(2) govern Petitioner's detention and must treat him as detained under § 1226(a).

CASES CITED

- Davis v. Woodford, 384 F.3d 628, 638 (9th Cir. 2004)
- Rodriguez Vazquez v. Bostock, No. C25-5240, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025)
- Hernandez Ramos v. Hermosillo, No. C25-2273, 2025 WL 3251159, at *2 (W.D. Wash. Nov. 21, 2025)

OPINION

Wamsley

PER CURIAM.

1 2 3 4 5 6 7 8

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

9 AT SEATTLE

10 11 Uriel MENDOZA ARAIZA, CASE NO. 2:25-cv-02139-TL 12 Petitioner, ORDER ON
PETITION FOR WRIT 13 v.

OF HABEAS CORPUS

14 Laura HERMOSILLO, Seattle Field Office Director, Enforcement and Removal 15 Operations,
U.S. Immigration and Customs Enforcement (Acting), et al., 16 Respondents. 17 18 This matter is
before the Court on Petitioner Uriel Mendoza Araiza’s petition for writ of 19 habeas corpus (Dkt.
No. 1) and Petitioner’s ex parte motion for a decision (Dkt. No. 11). 20 Petitioner is presently
detained at the Northwest ICE Processing Center (“NWIPC”) in Tacoma, 21 Washington, where
he has been held since Immigration and Customs Enforcement (“ICE”) 22 officers apprehended
him on September 29, 2025. Id. ¶ 4. Having reviewed the petition and 23 motion, Respondents’
return (Dkt. No. 9), Petitioner’s traverse (Dkt. No. 10), and the relevant 24 record, the Court
GRANTS the petition.

1 I. BACKGROUND

2 Petitioner, born in 1982, is a native and citizen of Mexico. Dkt. No. 4-2 (Notice to 3 Appear) at

2. Petitioner does not have lawful status in the United States and asserts that he “entered the United States without inspection over twenty years ago and was not apprehended on arrival.” Dkt. No. 1 ¶¶ 4(a)–(b). Relevant here, in 2006, Petitioner was convicted of shoplifting in Monterey County, California. Dkt. No. 1 ¶ 10. On September 29, 2025, ICE officers apprehended Petitioner in Yakima, Washington. Dkt. No. 4-1 (Record of Deportable/Inadmissible Alien) at 4. After apprehending Petitioner, the Department of Homeland Security (“DHS”) placed Petitioner in removal proceedings pursuant to 8 U.S.C. § 1182(a)(6)(A)(i), charging Petitioner as being inadmissible as someone who entered the United States without inspection. Dkt. No. 1 ¶ 5. On October 24, 2025, an immigration judge (“IJ”) denied Petitioner’s bond request based on lack of jurisdiction, finding that Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). Id. ¶ 6. The IJ also found that Petitioner is subject to mandatory detention pursuant to the Laken Riley Act (“LRA”), Pub. L. 115 No. 119–1, 139 Stat. 3 (2025), which provides that a person who “is inadmissible under paragraph (6)(A), (6)(C), or (7) of section 1182(a) of this title” and who “is charged with, is arrested for, is convicted of, admits having committed, or admits committing acts which constitute the essential elements of . . . shoplifting” is subject to mandatory detention. 8 U.S.C. § 1226(c)(1)(E). Dkt. No. 1 ¶¶ 7–8. The IJ determined that Petitioner’s 2006 conviction for shoplifting places Petitioner within the ambit of the LRA, thus rendering his detention mandatory. On October 30, 2025, Petitioner filed the instant petition for writ of habeas corpus. Dkt.

No. 1. That same day, Petitioner filed an ex parte motion for an order to show cause. Dkt. No. 2.

On November 7, 2025, the Court granted the motion and set a briefing schedule. Dkt. No. 8. On November 24, 2025, the petition became ripe for review. Id. at 3. On December 5, 2025, Petitioner filed an ex parte motion for a decision, requesting an immediate decision on the habeas petition. Dkt. No. 11.

II. LEGAL STANDARD

“Writs of habeas corpus may be granted by . . . the district courts . . . within their respective jurisdictions.” 28 U.S.C. § 2241(a). A habeas petitioner must prove by the preponderance of the evidence that he is “in custody in violation of the Constitution or laws or treaties of the United States.” *Davis v. Woodford*, 384 F.3d 628, 638 (9th Cir. 2004); 28 U.S.C. § 2241(c).

III. DISCUSSION

Petitioner’s petition presents the Court with three questions. First, the Court must determine whether the LRA applies retroactively to Petitioner’s 2006 shoplifting conviction. If it does, then Petitioner’s detention is mandatory and the petition must be denied. Second, if the LRA does not apply retroactively, then the Court must determine whether Petitioner is a class member of the Bond Denial Class defined in *Rodriguez Vazquez v. Bostock*, No. C25-5240, 2025 WL 2782499, at *27 (W.D. Wash. Sept. 30, 2025). Third, and finally, the Court must adjudicate

17 the merits of the petition. 18 A. Retroactivity of the Laken Riley Act and Class Membership 19 Respondents assert that “[w]hile [they] do not agree with the Rodriguez Vazquez 20 decision, they do not oppose this Petitioner being considered members of the Bond Denial Class 21 for purposes of this litigation.” Dkt. No. 9 at 3 (footnote omitted). This assertion means that 22 Respondents agree with Petitioner that the LRA does not apply retroactively because a 23 noncitizen to whom the LRA applies cannot by definition be included in the Rodriguez Vazquez 24 Bond Denial Class. See Rodriguez Vazquez, 2025 WL 2782499, at *6 (defining class members as 1 noncitizens who, in part, “are not or will not be subject to detention under 8 U.S.C. § 1226(c)” — 2 regarding the detention of criminal noncitizens — “at the time the noncitizen is scheduled for or 3 requests a bond hearing”). Put differently, if Respondents agree that Petitioner is in the Bond 4 Denial Class, they must also agree that the LRA does not apply to him or to his 2006 conviction. 5 The Court thus considers Respondents to have conceded the questions concerning 6 retroactivity with regard to the LRA and class membership. 7 B. Habeas Corpus 8 Because the Court treats Petitioner as a member of the Rodriguez Vazquez Bond Denial 9 Class, the declaratory relief that the Rodriguez Vazquez court issued to class members is 10 appropriately issued to Petitioner here: 11 Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 12 8 U.S.C. § 1225(b)(2). The Court further declares that the Tacoma Immigration Court’s practice of denying bond to Bond Denial 13 Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act. 14 15 Rodriguez Vazquez, 2025 WL 2782499, at *27. Therefore, “[f]or the same reasons that this Court 16 granted Bond Denial Class members declaratory relief, the Court finds that Petitioner[] [is] 17 detained under § 1226(a) and not subject to mandatory detention under § 1225(b)(2).” 18 Hernandez Ramos v. Hermosillo, No. C25-2273, 2025 WL 3251159, at *2 (W.D. Wash. Nov. 19 21, 2025) (citing Rodriguez Vazquez, 2025 WL 2782499, at *27). Pursuant to Rodriguez 20 Vazquez, then, and similarly to other Bond Denial Class members, Petitioner has shown that he is 21 “in custody in violation of the” INA. See 28 U.S.C. § 2241(c)(3). 22 Given Petitioner’s class membership, Respondents assert that “the appropriate relief 23 would be for [Petitioner] to have a bond redetermination hearing in the immigration court 24 pursuant to 8 U.S.C. § 1226(a).” Dkt. No. 9 at 4. The Court agrees.

1 IV. CONCLUSION

2 Therefore, Petitioner’s petition (Dkt. No. 1) and ex parte motion (Dkt. No. 11) are 3 || GRANTED. It is hereby ORDERED: 4 (1) Respondents SHALL release Petitioner, un/ess they administer a bond hearing to 5 Petitioner under 8 U.S.C. § 1226(a), within seven (7) days of this Order; 6 (2) At the bond hearing, Respondents SHALL not conclude or argue that either 8 7 U.S.C. §§ 1226(c) or 1225(b)(2) governs Petitioner’s detention. Respondents 8 SHALL consider Petitioner to be detained under Section 1226(a). 9 (3) Any fee petition should be filed within the deadlines set by the Equal Access 10 to Justice Act, 28 U.S.C. § 2412. 1] 12 Dated this 8th day of December, 2025. ana Lin 14 United States District Judge 15 16 17 18 19 20 21 22 23 24

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