UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Marta Cesilia Escalante Perez,

Petitioner,

v.

JULIO HERNANDEZ, Seattle Field Office Director, Immigration and Customs Enforcement and Removal Operations; TODD LYONS, Acting Director of U.S. Immigration Customs Enforcement; PAMELA BONDI, Attorney General of the United States; BRUCE SCOTT, Warden, Northwest ICE Processing Center; KRISTI NOEM, Secretary of U.S. Department of Homeland Security; and EOIR.

Respondents.

Case No.:

Agency No. A-file No. XXX-XXX-118

DECLARATION OF KATHLEEN PRITCHARD IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

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DECLARATION OF KATHLEEN PRITCHARD IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, Kathleen Pritchard, under penalty of perjury, do solemnly declare:

1. My name is Kathleen Pritchard. I am a licensed attorney and member in good standing of the Oregon Bar. I am counsel in the above-captioned matter. I submit this declaration in support of Petitioner Marta Cesilia Escalante Perez's Writ of Habeas Corpus. I am 34 years old, and I have personal knowledge of the facts in this declaration. If called upon to do so, I could and would competently testify about them.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Petitioner's Order of Release on Recognizance (dated on October 15, 2015) and attached Personal Report Record showing dates on which Petitioner attended scheduled check-ins with ICE.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Joint Motion to Dismiss Petitioner's prior removal proceedings.

4. Attached hereto as Exhibit 3 is a true and correct copy of DHS Form I-213 (dated August 7, 2025), created by DHS after Petitioner's August 7, 2025 arrest by ICE.

5. Attached hereto as Exhibit 4 is a true and correct copy of DHS Form I-826, Notice to Appear (dated August 7, 2025), which DHS used to commence Petitioner's 2025 removal proceedings after her prior removal proceedings were terminated without prejudice in 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of Petitioner's Petition for Writ of Habeas Corpus, Case No. 2:25-cv-02054 (filed on October 21, 2025).

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7. Attached hereto as Exhibit 6 is a true and correct copy of U.S. District Court Judge Tiffany M. Cartwright's Order Granting Petitioner's Petition for Writ of Habeas Corpus, Case No. 2:26-cv-00125 (dated November 26, 2025).

8. Attached hereto as Exhibit 7 is a true and correct copy of Petitioner's 81-page evidence packet in support of her release on bond as submitted to the Tacoma Immigration Court (filed on December 5, 2025).

9. Attached hereto as Exhibit 8 is a true and correct copy of Immigration Judge John Odell's Order denying Petitioner's request for release on bond (dated December 9, 2025).

10. Attached hereto as Exhibit 9 is a true and correct copy of an email from Petitioner's counsel (dated March 19, 2026) to the Tacoma Immigration Court requesting a digital audio recording of the bond hearing. A clerk of the Tacoma Immigration Court informed me that no digital audio recording was created for Petitioner's December 9, 2025 bond hearing. The clerk also confirmed that no transcript of the December 9, 2025 bond hearing was made.

11. Attached hereto as Exhibit 10 is the Notice of Receipt for the administrative appeal Petitioner of Immigration Judge John Odell's No Bond Order (dated March 18, 2026).

12. Attached hereto as Exhibit 11 is the Notice of Receipt for the appeal Petitioner filed on October 28, 2025 to challenge the removal order entered against her on October 24, 2025 (dated October 29, 2025).

13. Attached hereto as Exhibit 12 are records from the criminal cases brought against Petitioner's abusive ex-partner relating to domestic violence he committed against Petitioner and Petitioner's minor child daughter.

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14. Attached hereto as Exhibit 13 is Petitioner's Form I-918, Supplement B, U Nonimmigrant Status Certification, signed by Sergeant Shawn Hershberger of the Woodburn Police Department, certifying under oath that Petitioner was the victim of several U-qualifying crimes including domestic violence, felonious assault, and kidnapping (dated Sept. 29, 2025).

15. Attached hereto as Exhibit 14 is Petitioner's Form I-213 generated by DHS shortly after Petitioner's entry into the United States and border apprehension (dated October 24, 2015).

I HEREBY DECLARE UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated this of 19th of March 2026, in Portland, Oregon

s/ Kathleen Pritchard

KATHLEEN PRITCHARD, OSB #225757*
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*Appearing Pro Hac Vice

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