

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

3 Greggory SORIO,

4 Petitioner,

5 vs.

6 LAURA HERMASILLO, FIELD OFFICE
7 DIRECTOR, SEATTLE ICE FIELD OFFICE,
8 DEPARTMENT OF HOMELAND SECURITY; KRISTI
9 NOEM, SECRETARY OF HOMELAND SECURITY;
10 DEPARTMENT OF HOMELAND SECURITY,
11 Respondents.

Case No.: 2:25-cv-2492

DECLARATION OF LAURA WHITEHILL
IN SUPPORT OF WRIT OF HABEAS
CORPUS UNDER 28 U.S.C. § 2241

12 **DECLARATION OF COUNSEL**

13 I, Laura Whitehill, declare as follows:

- 14 1. I submit this declaration in support of Petitioner's petition for writ of habeas corpus
15 and application for temporary restraining order. I am over 18, have personal
16 knowledge of the facts set forth herein, and, if called as a witness, could testify
17 competently as set forth below.
- 18 2. I am a licensed physician in the state of Washington specializing in family medicine,
with additional training in community health and social determinants of health.
3. I completed medical school in 2021 and have practiced medicine continuously since
then.
4. In preparation of this declaration, I reviewed Mr. Sorio's medical records, including
hospitalization and discharge records from St. Joseph's Medical Center for his

admission from 10/22/2025, through 11/12/2025, as well as, his chart notes from his appointment at Franciscan Digestive Care Associates on 11/26/2025.

5. I met with and evaluated Mr. Sorio on 12/14/2025, during which he provided additional information concerning his medical conditions and history.

6. I also met and physically evaluated Mr. Sorio on 12/15/2025 around 8:00PM.

7. It is my medical opinion, based on the information mentioned above and my training and experience, that Mr. Sorio's condition required escalation of care earlier than it occurred. He experienced a prolonged period of worsening gastrointestinal symptoms, including persistent bleeding. The development of ongoing bleeding accompanied by weakness, fever, and functional deterioration represents a level of illness that warrants prompt medical reassessment and escalation of care.

8. The severity and duration of Mr. Sorio's symptoms indicate that his ulcerative colitis was not adequately controlled for an extended period of time. Persistent rectal bleeding, accompanied by weight loss and systemic symptoms, represents a level of illness that generally warrants prompt medical reassessment and escalation of care. Such a presentation raises concern for ongoing blood loss and anemia and typically requires evaluation to determine the source and severity of bleeding. The duration and progression of Mr. Sorio's symptoms indicate a degree of illness that exceeds what is ordinarily managed through routine outpatient follow-up alone. Earlier evaluation and intervention would have altered the progression of his illness.

9. In my medical opinion, Mr. Sorio's bone infection and subsequent toe amputation are consistent with a significantly compromised immune state at the time the infection developed. The unusually rapid progression and severity of the toe infection suggest

1 that Mr. Sorio was already ill, with impaired immune function, rather than
2 experiencing an isolated local infection. His underlying ulcerative colitis, with
3 prolonged inflammation and systemic effects, likely contributed to this immune
4 vulnerability and increased susceptibility to serious infection.

5 10. Mr. Sorio remains medically tenuous. His treatment of ulcerative colitis is ongoing,
6 and medical stability has not yet been established. He requires physical therapy for
7 gait retraining following toe amputation, clinical evaluation of persistent thumb
8 dysfunction, assessment of dermatologic symptoms, and monitoring of blood pressure
9 due to current high-dose steroid therapy. These ongoing needs demonstrate that his
10 recovery is incomplete and that continuity of care remains medically necessary.

11 11. Due to significant reconditioning, recent amputation, and incomplete treatment,
12 prolonged travel and immobility would place undue physiologic strain on his body
13 and increase the risk of medical complications. In addition, travel to a setting where
14 continuity of care and timely medical follow-up cannot be assured would introduce
15 additional risk while his condition remains unstable.

16 I declare under penalty of perjury under the laws of the United States of America that
17 the foregoing information is true and correct.

18 Dated this 16th of December, 2025:

Laura Whitehill, MD
860 729 9268