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7 Attorneys for Respondents

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 K.M.G..

12 Petitioner,

13 v.

14 CHRISTOPHER J. LAROSE; et al.,

15 Respondents.

Case No.: 25-cv-1356-DMS-VET

JOINT MOTION TO VACATE

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19 The parties, through their respective counsel of record, respectfully request an
20 order vacating the current briefing schedule and the hearing set for Thursday, June 5,
21 2025. On May 28, 2025, Petitioner filed a petition for writ of habeas corpus. ECF No.
22 1. On May 29, 2025, the Court issued an order setting certain deadlines for the filing of
23 Respondent's response and Petitioner's reply, and setting a hearing for Thursday, June
24 5, 2025 at 1:30 p.m. ECF No. 2.

25 The parties are currently working towards an extrajudicial resolution of the
26 habeas petition. Immigration and Customs Enforcement (ICE) has agreed to jointly
27 move to reopen and remand with the Board of Immigration Appeals, to reopen
28 Petitioner's removal proceedings under 8 U.S.C. § 1229a. As such, the parties request

1 that the June 5, 2025 hearing and briefing schedule be vacated. If the habeas petition is
2 not dismissed by June 18, 2025, the parties will file a joint status report.

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4 DATED: June 4, 2025

s/ Joshua A. Altman
JOSHUA A. ALTMAN
Attorneys for Petitioner

7 DATED: June 4, 2025

ADAM GORDON
United States Attorney

s/Erin M. Dimbleby
ERIN M. DIMBLEBY
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14 **SIGNATURE CERTIFICATION**

15 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
16 and Procedures of the United States District Court for the Southern District of
17 California, I hereby certify that the content of this document is acceptable to Joshua
18 Altman, counsel for Petitioner, and that I have obtained Mr. Altman's authorization to
19 affix his electronic signature to this document.

20 DATED: June 4, 2025

s/Erin M. Dimbleby
ERIN M. DIMBLEBY
Assistant United States Attorney