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10 Attorney for Respondents

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 K.M.G.,

14 Petitioner,

15 v.

16 CHRISTOPHER J. LAROSE; et al.,

17 Respondents.

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

JOINT STATUS REPORT

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20 The parties, through their respective counsel of record, respectfully submit this
21 joint status report and request the Court stay proceedings for an additional 30 days. *See*
22 ECF No. 16. The Court has already granted two extensions on June 18, 2025 and July
23 2, 2025. This marks the parties third extension request. The parties requested in their
24 July 2, 2025, Joint Status Report (ECF No. 15) that the matter continue to be stayed to
25 allow time for ICE to cancel Petitioner's expedited removal order and issue Petitioner
26 a new Notice to Appear (NTA), for Petitioner to file a new asylum application (I-589),
27 and for Petitioner to potentially seek a new bond hearing before an immigration judge.
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1 The parties noted that if the habeas petition is not dismissed by August 1, 2025, the
2 parties would file another joint status report. *Id.*

3 The parties are continuing the work towards an extrajudicial resolution of the
4 habeas petition. On July 1, 2025, Petitioner's expedited removal order was canceled and
5 ICE served Petitioner a new Notice to Appear, placing her back into Section 1229a
6 removal proceedings. Now that Section 1229a proceedings have resumed, Petitioner
7 has refiled her asylum application (Form I-589), and she has moved an immigration
8 judge to redetermine her custody, asserting that ICE is detaining her under 8 U.S.C. §
9 1226(a) and not 8 U.S.C. § 1225(b). Yesterday, on July 30, 2025, an immigration judge
10 scheduled her custody redetermination hearing for 1 p.m. on August 8, 2025.

11 The parties request an additional 30 days to include the Labor Day weekend, up
12 to and including Tuesday, September 2, 2025, to continue working towards an
13 extrajudicial resolution of the habeas petition. They will file a new status report on
14 September 2, 2025, if the habeas petition is not dismissed by that date.

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16 DATED: July 31, 2025

17 s/ Joshua A. Altman (w/ permission)
18 JOSHUA A. ALTMAN
19 Attorneys for Petitioner

20 DATED: July 31, 2025

21 s/ Erhan Bedestani
22 ERHAN BEDESTANI
23 Trial Attorney
24 Attorney for Respondents
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DATED: July 31, 2025

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