

District Judge Jamal N. Whitehead
Chief Magistrate Judge Theresa L. Fricke

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ARTURO SEPULVEDA AYALA,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 2:25-cv-01063-JNW-TLF

STIPULATED MOTION AND
[PROPOSED] ORDER TO CONTINUE
DEADLINES

Noted for Consideration:
November 13, 2025

Pursuant to Federal Rule of Civil Procedure 6, and Local Rule 10(g), Petitioner and Federal Respondents¹ stipulate and move to extend Federal Respondents' deadline to respond to Petitioner's Application for Attorneys' Fees (Dkt. No. 25) to December 17, 2025. Federal Respondents' current deadline is November 17, 2025. There is good cause for this Court to extend the deadline.

An extension of the briefing deadlines may allow the parties to resolve Petitioner's fees and cost claims without further litigation. Due to the lapse in appropriations to the Department of Justice, Federal Respondents' counsel was unable to work on resolving EAJA fee requests. However, now that the lapse in appropriations has ended and the government has reopened,

¹ Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 Federal Respondents' counsel may confer with the agency and determine whether settlement is
2 possible. If it is a possibility, the parties will attempt to resolve this issue without further judicial
3 involvement.

4 The parties propose the following response schedule to Petitioner's motion for attorneys'
5 fees:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to Fees Motion	December 17, 2025
Petitioner's reply in support of the Fees Motion	December 23, 2025

10 Accordingly, the parties request that the Court enter the proposed briefing schedule.

11 DATED on this 13th day of November, 2025.

12 Respectfully submitted,

13 CHARLES NEIL FLOYD
United States Attorney

GIBBS HOUSTON PAUW

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Attorney for Petitioner

20 Attorneys for Federal Respondents

21 *I certify that this memorandum contains 209*
22 *words, in compliance with the Local Civil*
23 *Rules.*

[PROPOSED] ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit briefing pursuant to the following schedule:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to Fees Motion	December 17, 2025
Petitioner's reply in support of the Fees Motion	December 23, 2025

DATED this ____ day of _____, 2025.

JAMAL N. WHITEHEAD
United States District Judge

Recommended for entry this ___ of _____, 2025.

THERESA L. FRICKE
United States Chief Magistrate Judge