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August 5, 2025

By ECF

The Honorable Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

Re: *Ramirez Lopez v. Trump*, No. 25 Civ. 4826 (JAV)

Dear Judge Vargas:

This Office represents the government in the above-referenced habeas corpus action. I write respectfully on behalf of the parties to request additional time to propose a schedule for resolution of the claims raised in the amended petition that was filed on Friday, July 25.

Since the amended petition was filed on July 25, the parties have engaged in discussions to potentially resolve this habeas matter by stipulation, including resolving the factual question of the date of petitioner's departure from the United States before her return in 2019. However, the parties require additional time to discuss with their respective clients and with each other about the various options that have been discussed. Accordingly, the parties jointly request that the Court extend the time to submit a briefing schedule for an additional three weeks, i.e., until August 26, 2025.¹

The Court's order currently "enjoins ICE from detaining Petitioner and stays Petitioner's removal from the United States until August 11, 2025," ECF No. 31. Petitioner requests that the Court further extend the temporary restraint by a corresponding three weeks, i.e., until September 1, 2025, to accommodate the parties' negotiations and to avoid prejudice to the petitioner. The government is unable to consent to an extension of the temporary injunctive relief.

¹ Counsel for the respective parties have various pre-planned absences in August.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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