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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17
18 PEDRO VASQUEZ PERDOMO; *et al.*,
19 Plaintiffs,

20 v.

21 KRISTI NOEM, in her official capacity as
22 Secretary of Homeland Security; *et al.*,
23 Defendants.
24
25
26
27
28

No. 2:25-cv-05605-MEMF-SP

**JOINT STATUS REPORT IN RESPONSE TO
COURT'S ORDER ON OSC HEARING AND PI
BRIEFING SCHEDULE [ECF No. 87]**

Hon. Maame Ewusi-Mensah Frimpong
United States District Judge

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Pursuant to the Court's July 11, 2025 Order (ECF No. 87), the parties submit this Joint Status Report addressing the schedule for further briefing and a hearing on both Plaintiffs' request for a preliminary injunction and the Court's Order to Show Cause.

The parties have met and conferred as directed but respectfully disagree on the appropriate timing for briefing and the hearing. A summary of the parties' proposed dates appears below, and their respective positions are set forth in the pages that follow.

Event	Plaintiffs' Proposal	Defendants' Proposal
PI Motion	July 28, 2025	July 28, 2025
Response	August 4 (7 days following PI Mot.)	September 11, 2025 (45 days following PI Mot.)
Reply	August 7 (10 days following PI Mot.)	September 25, 2025 (14 days following PI Mot.)
Hearing	August 14, 2025	October 9, 2025, 10:00 a.m. PT

1 *Plaintiffs' Position:* Plaintiffs respectfully request an expedited briefing schedule and
2 hearing date for their anticipated motion for a preliminary injunction to ensure their rights
3 are protected during the pendency of the litigation, and to streamline the remainder of the
4 litigation. After the Court issued the temporary restraining order, *see* ECF 87, Defendants
5 moved quickly to get out from under it by filing an immediate appeal and emergency
6 motion to stay at the Ninth Circuit, and filing *ex parte* a motion to stay the order in this
7 Court. *See* ECF 89, 94. Defendants have made their intention clear: they wish to proceed
8 with immigration enforcement unencumbered by any judicial scrutiny of their policies and
9 practices. When Defendants asked for their longer briefing schedule and Plaintiffs'
10 counsel asked whether they would stipulate to terms of the TRO while the parties are
11 briefing a motion for preliminary injunction, Defendants' counsel demurred. In the
12 absence of any assurances that Plaintiffs' rights will be protected in the interim, Plaintiffs
13 request a preliminary injunction hearing as soon as the Court can accommodate one. And
14 while the existing temporary restraining order regarding legal access at B-18—which
15 Defendants have not appealed or sought to stay—will continue to protect Plaintiffs' Fifth
16 Amendment rights, there is no reason to delay a hearing on that issue either.

17 Plaintiffs' proposed schedule is fair to both sides. It ensures that the Court can
18 provide a resolution on Plaintiffs' preliminary injunction matter expeditiously, especially
19 in the event the restraining order is stayed. This schedule also provides sufficient time for
20 Defendants to investigate the case and prepare their opposition papers. Under Plaintiffs'
21 proposal, Defendants will have 32 days from the date Plaintiffs filed their detailed First
22 Amended Complaint and TRO application to file their opposition—time they have should
23 have begun to use to marshal their defense to the preliminary injunction request. *See* ECF
24 101 (noting that Defendants filed a 24-page brief and “had an opportunity to be heard in a
25 lengthy adversarial hearing”). Defendants will suffer little prejudice if the Court approves
26 Plaintiffs' requested schedule. Plaintiffs are also willing to file a reply within days, to
27 allow the Court one week to review the Parties' papers.

1 *Defendants' Position:* Defendants request 45 days to respond to Plaintiffs' anticipated
2 motion, with their opposition due September 11, 2025, and seek a hearing on October 9,
3 2025. This schedule balances Plaintiffs' desire to proceed promptly with Defendants' need
4 for a fair opportunity to prepare a comprehensive response. Plaintiffs' motion will raise
5 complex issues, implicate federal immigration enforcement across multiple jurisdictions,
6 and rests on a substantial evidentiary record. To prepare an appropriate response,
7 Defendants must coordinate across agencies, perform legal and factual analysis, and
8 investigate individualized allegations stemming from five individual Plaintiffs and four
9 organizational Plaintiffs (and their many unknown members).

10 Defendants recognize the importance of the issues at stake and are committed to a
11 thorough and timely response that aids the Court's resolution. Defendants' 45-day
12 proposal reflects the government's good-faith effort to ensure fair and orderly resolution
13 of the issues. By contrast, Plaintiffs' suggestion that the government respond in just
14 7 days—after weeks of lead time—is neither equitable nor realistic. A one-week deadline
15 risks rushed, underdeveloped briefing, would impair the government's ability to respond
16 meaningfully and deprive this Court of the fulsome record that would enable it to decide
17 the case correctly. Alternatively, should the Court prefer an even more expedited schedule,
18 Defendants would endeavor to respond within 30 days—a period found reasonable in other
19 recent nationally significant cases. *E.g., United Farm Workers v. Noem*, No. 1:25-cv-
20 00246, ECF No. 28 (E.D. Cal. Mar. 17, 2025).

21 Defendants' proposal also affords Plaintiffs 14 days for reply—twice the standard
22 period—reflecting parity in briefing. To the extent Plaintiffs express concern about the
23 TRO's expiration, Defendants remain willing to meet and confer regarding any
24 appropriate stipulations in the interim. This schedule would also afford the Court sufficient
25 time to review the parties' submissions in advance of consolidated argument on the OSC
26 and preliminary injunction. The proposed schedule is fair, efficient, and tailored to the
27 complexity of the case.

1 Dated: July 16, 2025

Respectfully submitted,

2
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ATTESTATION OF FILER

I attest that the other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 16, 2025

Respectfully submitted,

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