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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12 T.P.S.,	)	No. 25-cv-05428-NC
13	)	
14 Petitioner-Plaintiff,	)	<b>STIPULATION TO EXTEND TIME TO</b>
15 v.	)	<b>RESPOND TO PETITION FOR WRIT OF</b>
16 POLLY KAISER, et al.,	)	<b>HABEAS CORPUS AND COMPLAINT FOR</b>
17 Respondents-Defendants	)	<b>DECLARATORY AND INJUNCTIVE RELIEF</b>

18  
19 Petitioner-Plaintiff T.P.S. ("Plaintiff") and Respondents-Defendants Polly Kaiser, Todd Lyons,  
20 Kristi Noem, and Pamela Bondi ("Defendants") hereby stipulate as follows:

21 1. On June 28, 2025, Petitioner filed a Petition for a Writ of Habeas Corpus and Complaint  
22 for Declaratory and Injunctive Relief ("Petition"), Dkt. No. 1, and an Ex Parte Motion for Temporary  
23 Restraining Order ("TRO"), Dkt. No. 2.

24 2. On June 30, 2025, the Duty Judge issued an order granting the TRO ex parte and setting a  
25 briefing and hearing schedule on Plaintiff's request for a preliminary injunction. Dkt. No. 4.

26 3. The parties twice stipulated to extend the briefing and hearing schedule, which the Court  
27 approved. Dkt. Nos. 15, 20. Defendants' opposition to Plaintiff's motion for a preliminary injunction is  
28 currently due on October 16, 2025, Plaintiff's reply is due on October 31, 2025, and an in-person

1 hearing is scheduled for November 12, 2025. Dkt. No. 20.

2 4. Defendants anticipate that the Court's ruling on the pending request for a preliminary  
3 injunction may inform its response to Plaintiff's pleading. Defendants thus believe that extending the  
4 time to respond to the Petition until after the Court has issued its decision on Plaintiff's request for a  
5 preliminary injunction would promote efficiency and preserve the parties' and the Court's resources.

6 5. Defendants thus requested, and Plaintiff agreed to, an extension of the deadline for  
7 Defendants to file their response to Plaintiff's Petition until 30 days following the Court's order on  
8 Plaintiff's request for a preliminary injunction.

9 6. This stipulation will not alter the date of any event or any deadline already fixed by the  
10 Court.

11 THEREFORE, IT IS HEREBY STIPULATED that Defendants' deadline to file their response to  
12 Plaintiff's Petition is extended until 30 days following the Court's order on Plaintiffs' request for a  
13 preliminary injunction.

14  
15 **IT IS SO STIPULATED.**

16  
17 DATED: August 28, 2025

Respectfully submitted,

18 CRAIG S. MISSAKIAN  
United States Attorney

19 /s/ Sapna Mehta  
20 SAPNA MEHTA  
Assistant United States Attorney

21 Attorneys for Respondents-  
22 Defendants

23 DATED: August 28, 2025

VAN DER HOUT LLP

24 /s/ Johnny Sinodis  
25 JOHNNY SINODIS

26 Attorneys for Petitioner-Plaintiff  
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28

**ECF ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I, Sapna Mehta, attest that I have obtained concurrence in the filing of this document from the other signatory listed here.

/s/ Sapna Mehta  
SAPNA MEHTA

**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS SO ORDERED. Defendants' deadline to file their response to Plaintiff's Petition is extended until 30 days following the Court's order on Plaintiff's request for a preliminary injunction.

DATED:

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NATHANAEL COUSINS  
United States Magistrate Judge