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

12	GUILLERMO MEDINA REYES,	)	No. 25-cv-05436-RFL
13	Petitioner-Plaintiff,	)	
14	v.	)	<b>JOINT STATEMENT RE CASE</b>
		)	<b>MANAGEMENT</b>
15	POLLY KAISER, et al.,	)	
16	Respondents-Defendants	)	
17	<hr/>		

18 Pursuant to the stipulation of the parties, Dkt. No. 28, the parties submit this Joint Statement  
19 regarding developments in this matter and a proposed case management schedule.

20 1. As previously reported, on July 25, 2025, the Department of Homeland Security ("DHS")  
21 submitted a motion with the San Francisco Immigration Court requesting that the Court schedule a pre-  
22 deprivation bond hearing for Petitioner. On August 12, 2025, the parties were notified that the  
23 Immigration Court granted DHS's motion. The Immigration Court has not yet scheduled the bond  
24 hearing.

25 2. Regarding Petitioner's July 27, 2025 arrest and Alameda County criminal case, counsel  
26 for Petitioner reports that a five-felony count complaint, attached as Exhibit A, was filed on July 30,  
27 2025. Petitioner was released from Alameda County criminal custody on July 31, 2025, on his own  
28 recognizance with court-ordered conditions including GPS electronic monitoring, mandatory curfew, a

1 mental health assessment, and required placement at an inpatient residential treatment program. He  
2 entered a not-guilty plea, and his next criminal court appearance is August 28, 2025.

3 3. The parties respectfully submit that further briefing on Petitioner's habeas petition should  
4 await the pre-deprivation bond hearing, to be held in Immigration Court. The parties will submit a  
5 further status report and proposed case management schedule no later than September 5, 2025.

6 4. The parties will continue to meet and confer about Petitioner's claims and the scope of  
7 the preliminary injunction. Respondents reserve the right to submit a request to the Court to modify the  
8 preliminary injunction in light of developments in this matter.

9 DATED: August 12, 2025

Respectfully submitted,

10 CRAIG H. MISSAKIAN  
United States Attorney

11 /s/ Pamela T. Johann

12 PAMELA T. JOHANN  
Assistant United States Attorney

13 Attorneys for Respondents-Defendants

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15 DATED: August 12, 2025

PANGAEA LEGAL SERVICES

16 /s/ Victoria Sun

17 VICTORIA SUN

18 Attorneys for Petitioner-Plaintiff

19 **ECF ATTESTATION**

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

22 /s/ Pamela T. Johann