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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, ) **JOINT STATEMENT RE CASE**  
14 ) **MANAGEMENT**  
v. )  
15 )  
POLLY KAISER, et al., )  
16 )  
Respondents-Defendants )  
17 )

18 Pursuant to the stipulation of the parties, Dkt. No. 29, the parties submit this Joint Statement  
19 regarding developments in this matter and a proposed case management schedule.

20 1. As previously reported, on August 12, 2025, the Immigration Court granted the motion of  
21 Respondent Department of Homeland Security (“DHS”) to schedule a pre-deprivation bond hearing for  
22 Petitioner. The bond hearing is scheduled for January 20, 2026.

23 2. On August 28, 2025, DHS filed a motion to advance the pre-deprivation bond hearing.  
24 Petitioner, appearing pro se, opposed the motion to allow him additional time to find counsel to  
25 represent him at that hearing.

26 3. On September 2, 2025, the Immigration Judge denied DHS’s motion to advance the pre-  
27 deprivation bond hearing. The next day, DHS filed a motion to reconsider. Petitioner intends to oppose  
28 that motion.

1 4. Two criminal cases against Petitioner remain pending—the case in Santa Clara County  
2 for felony vandalism arising from the May 2025 incident and the five-felony count complaint pending in  
3 Alameda County Superior Court relating to his July 27, 2025 arrest for attempted car-jacking. Petitioner  
4 remains released from Alameda County criminal custody and subject to court-ordered conditions,  
5 including GPS electronic monitoring and a mandatory curfew. Since August 6, 2025, he has been in a  
6 residential treatment program 

7 5. The parties respectfully submit that further briefing on Petitioner’s habeas petition should  
8 await clarity regarding the pre-deprivation bond hearing to be held in Immigration Court. The parties  
9 will submit a further status report no later than October 10, 2025.

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

13 DATED: September 5, 2025

Respectfully submitted,

14 CRAIG H. MISSAKIAN  
United States Attorney

15 /s/ Pamela T. Johann

16 PAMELA T. JOHANN  
Assistant United States Attorney

17 Attorneys for Respondents-Defendants

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19 DATED: September 5, 2025

PANGEA LEGAL SERVICES

20 /s/ Victoria Sun

VICTORIA SUN

21 Attorneys for Petitioner-Plaintiff

22  
23 **ECF ATTESTATION**

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

26 /s/ Pamela T. Johann