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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 v. ) **MANAGEMENT**  
15 )  
SERGIO ALBARRAN,<sup>1</sup> et al., )  
16 Respondents-Defendants )  
17

18 Pursuant to the stipulation of the parties, Dkt. No. 30 the parties submit this Joint Statement  
19 regarding developments in this matter.

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. DHS filed a motion to advance the pre-deprivation bond hearing. On September 2, 2025,  
24 the Immigration Judge denied DHS’s motion to advance the pre-deprivation bond hearing. DHS filed a  
25 motion to reconsider the denial of its motion to advance. On September 19, 2025, the Immigration  
26 Judge denied DHS’s motion for reconsideration. The pre-deprivation bond hearing remains scheduled  
27

28 <sup>1</sup> Sergio Albarran is automatically substituted as a respondent in this matter pursuant to Rule 25(d) of the Federal Rules of Civil Procedure.

1 for January 20, 2026.

2 3. On September 12, 2025, Respondents filed a notice of appeal of this Court’s order  
3 granting a preliminary injunction. The opening brief has not yet been filed in that appeal.

4 4. Two criminal cases against Petitioner remain pending—the case in Santa Clara County  
5 for felony vandalism arising from the May 2025 incident and the five-felony count complaint pending in  
6 Alameda County Superior Court relating to his July 27, 2025 arrest for attempted car-jacking. Petitioner  
7 remains released from Alameda County criminal custody and subject to court-ordered conditions,  
8 including GPS electronic monitoring and a mandatory curfew. On September 5, 2025, Petitioner left the  
9 residential treatment program at [REDACTED] He is currently receiving outpatient  
10 treatment.

11 5. The parties respectfully submit that further briefing on Petitioner’s habeas petition should  
12 await clarity regarding the pre-deprivation bond hearing to be held in Immigration Court and resolution  
13 of the parties’ appeal. The parties will submit a further status report following resolution of the appeal.

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

17 DATED: October 10, 2025

Respectfully submitted,

18 CRAIG H. MISSAKIAN  
United States Attorney

19 /s/ Pamela T. Johann\*  
20 PAMELA T. JOHANN  
Assistant United States Attorney

21 Attorneys for Respondents-Defendants

22  
23 DATED: October 10, 2025

PANGEA LEGAL SERVICES

24 /s/ Victoria Sun  
25 VICTORIA SUN

26 Attorneys for Petitioner-Plaintiff

27 *\*In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that she obtained  
28 concurrence in the filing of this document from the other signatory listed here.*