

**SCOTT E. BRADFORD, OSB #062824**

United States Attorney

District of Oregon

**SUSANNE LUSE, OSB #142489**

Assistant United States Attorney

[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)

United States Attorney's Office

District of Oregon

1000 SW Third Ave., Suite 600

Portland, Oregon 97204

Telephone: (503) 727-1000

Attorneys for Respondents

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**M-S-L, an adult,**

Petitioner,

v.

**DREW BOSTOCK; TODD LYONS; U.S.  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT; KRISTI NOEM; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; PAMELA BONDI,**

Respondents.

Case No. 6:25-cv-01204-AA

**JOINT MOTION FOR STAY**

The parties hereby move for an additional 30-day stay of the above-captioned case for the following reasons:

1. On December 12, 2025, this Court granted the parties' joint request to extend the stay to finalize settlement discussions and set the deadline for a joint status report for January 12, 2026. ECF 38.
2. The parties, through counsel, request an additional extension of the stay by 30-days to finalize and execute settlement documentation.
3. The parties will notify the Court by joint status report or otherwise if this matter resolves before the stay deadline.

Respectfully submitted this 12th day of January 2026.

/s/ Robert E. Easton  
ROBERT E. EASTON  
*Attorney for Petitioner*

SCOTT E. BRADFORD  
United States Attorney  
District of Oregon

/s/ Susanne Luse  
SUSANNE LUSE  
Assistant United States Attorney  
*Attorneys for Respondents*