1	THE HONORABLE TIFFANY M. CARTWRIGHT				
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7	UNITED STATES DISTRICT COURT				
8	WESTERN DISTRICT OF WASHINGTON				
9	Phong Thanh Nguyen,				
10	Petitioner,	Civil Case No. 2:25-cv-01398-TMC-SKV			
11	v.	STIPULATED MOTION FOR			
12	Bruce SCOTT, Warden, Northwest ICE Processing Center; Drew BOSTOCK,	BRIEFING SCHEDULE AND REQUEST FOR ORAL ARGUMENT			
13	Enforcement and Removal Operations, Seattle Field Office Director, U.S.	NOTED FOR CONSIDERATION:			
14	Immigration and Customs Enforcement; Kristi NOEM, Secretary, U.S. Department	JULY 30, 2025			
15	of Homeland Security; U.S. DEPARTMENT OF HOMELAND				
16	SECURITY,				
17	Respondents.				
18	JOINT STIPULATED MOTION FOR BRIEFING SCHEDULE				
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20	On July 24, 2025, Petitioner Phong Thanh Nguyen filed a petition for writ of habeas				
21	corpus and motion for a temporary restraining order ("TRO") against Respondents to challenge				
22	his re-detention at the Northwest Immigration and Customs Enforcement ("ICE") Processing				
23	Center. Dkts. 1 and 2. Respondents filed their opposition to the TRO on July 26, 2025. Dkt. 13.				
24	A hearing was held on July 29, 2025, on the TRO, and at that hearing, the court ordered all				
25	parties to meet and confer to discuss a briefing schedule on a motion for a preliminary injunction				
26	("PI") and hearing date for the PI.				
	JOINT STIPULATED BRIEFING SCHEDULE - 1				

Case No. 2:25-cv-01398-TMC-SKV

1	Parties have conferred on	the briefing so	chedule and hearing date and stipulate to the		
2	following schedule:				
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4	August 1	Petitioner fil	es motion for PI		
5	August 1	Respondents	file opposition to motion for PI		
6	August 1	Petitioner file	es reply in support of motion for PI		
7	August 1	Oral argume	nt on motion for PI		
8	The Parties agree that all briefing will be limited to the page limits set forth in the local				
9	court rules. The Parties also agree that an evidentiary hearing is not necessary.				
10	The Parties respectfully request that the Court enter the attached Proposed Order on the				
11	Parties' briefing schedule on the motion for PI and request for oral argument.				
12	DATED this 30th day of July, 2025.				
13	Respectfully submitted,				
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16	<u>/s/ Jennifer Pasquarella</u> Jennifer Pasquarella (WA Bar N	No. 62205)	TEAL LUTHY MILLER Acting United States Attorney		
17	Seattle Clemency Project 20415 72nd Ave South, Suite 1-	-415	·		
18	Kent, WA 98032 Telephone: 206.682.1114		/s/ Brian C. Kipnis BRIAN KIPNIS		
19	jennie@seattleclemencyproject.	org	REBECCA COHEN, WSBA # 31767 Assistant United States Attorneys		
20	STOEL RIVES LLP		United States Attorney's Office Western District of Washington		
21	/s/ Tiffany Wang		700 Stewart Street, Suite 5220 Seattle, WA 98101		
22	Tiffany Wang, WSBA No. 5736		Email: brian.kipnis@usdoj.gov rebecca.cohen@usdoj.gov		
23	600 University Street, Suite 360 Seattle, WA 98101	10	Attorneys for Federal Respondents		
24	Telephone: 206.624.0900 tiffany.wang@stoel.com		mornoyo joi 1 ouoi ai nesponaems		
25	Attorneys for Petitioner				
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JOINT STIPULATED MOTION FOR BRIEFING SCHEDULE - 2 Case No. 2:25-cv-01398-TMC-SKV