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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARLON OMAR BACA BELTRAND,

Petitioner,

v.

Jason KNIGHT, Acting Las Vegas/Salt
Lake City Field Office Director,
Enforcement and Removal Operations,
United States Immigration and Customs
Enforcement (ICE); et al.,

Respondents.

Case No. 2:25-cv-01430-CDS-EJY

**Joint Stipulation and Order to Continue
Hearing Regarding Petitioner's Ex
Parte Motion for a Temporary
Restraining Order (ECF No. 21)**

Under LR IA 6-1 and LR IA 6-2, Petitioner Marlon Omar Baca Beltrand ("Petitioner") and the Federal Respondents, by and through their undersigned counsel, hereby stipulate and jointly request that the Court grant a one-week continuance of the hearing regarding Petitioner's Ex Parte Motion for a Temporary Restraining Order (ECF No. 21) ("Petitioner's Motion"). This is the parties' first request to continue the hearing.

Petitioner filed an Amended Petition for Writ of Habeas Corpus (ECF No. 17), and on September 2, 2025, he filed an Ex Parte Motion for a Temporary Restraining Order (ECF No. 21). The Court subsequently issued an Order Setting Hearing, Directing Service of Ex Parte Motion for a Temporary Restraining Order, and Advancing Response (ECF No. 22), directing Petitioner to serve a copy of Petitioner's Motion on counsel for the Federal Respondents, directing the Federal Respondents to file a response by 1:00 p.m. on September 4, 2025, and scheduling a hearing regarding Petitioner's Motion for 10:00 a.m. on September

1 5, 2025. On September 4, 2025, the Federal Respondents filed a Status Report (ECF No. 24),
2 updating the Court regarding the parties' negotiations and efforts to cooperatively resolve
3 Petitioner's Motion.

4 The parties have conferred and agreed to submit this joint stipulation for a one-week
5 continuance of the hearing regarding Petitioner's Motion. Although the Federal Respondents
6 have agreed not to subject Petitioner to expedited removal proceedings under 8 U.S.C. §
7 1225(b)(1), thus addressing the primary concerns raised by Petitioner's Motion, the parties'
8 negotiations are ongoing and the parties are nearing an agreement regarding the specific
9 language of a stipulation that would resolve Petitioner's Motion. The parties thus need
10 additional time to finalize their stipulation. Further, counsel for the Federal Respondents has
11 a previously scheduled, out-of-state doctor's appointment on September 4, 2025, and cannot
12 attend the motion hearing in person.

13 Respectfully submitted this 4th day of September 2025.

14 IT IS SO STIPULATED.

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16 STOWELL CRAYK PLLC

17
18 /s/ Marti L. Jones
19 MARTI L. JONES
Attorney for Plaintiff

SIGAL CHATTAH
Acting United States Attorney

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21 /s/ Christian R. Ruiz
22 CHRISTIAN R. RUIZ
23 Assistant United States Attorney

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25 **IT IS SO ORDERED:**

26
27 United States District Judge

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DATED: _____