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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

S-M-J,

Petitioner,

Case No. 6:25-cv-1425-MTK

Agency No. A



v.

DREW BOSTOCK, et al, Respondents include:
(1) Drew Bostock, Seattle Field Office Director,
Immigration and Customs Enforcement and
Removal Operations ("ICE/ERO"); (2) Todd
Lyons, Acting Director of Immigration Customs
Enforcement ("ICE"); (3) Kristi Noem Secretary
of the Department of Homeland Security
("DHS"); (4) Pamela Bondi, Attorney General of
the United States; (5) U.S. Immigration and
Customs Enforcement; and 6) U.S. Department
of Homeland Security,

Respondents.

**UNOPPOSED MOTION TO
CONSOLIDATE CASES**

-- AND --

J-L-M,

Petitioner,

Case No. 6:25-cv-1426-MTK

Agency No. A

v.

DREW BOSTOCK, et al, Respondents include:
(1) Drew Bostock, Seattle Field Office Director,
Immigration and Customs Enforcement and
Removal Operations (“ICE/ERO”); (2) Todd
Lyons, Acting Director of Immigration Customs
Enforcement (“ICE”); (3) Kristi Noem Secretary
of the Department of Homeland Security
(“DHS”); (4) Pamela Bondi, Attorney General of
the United States; (5) U.S. Immigration and
Customs Enforcement; and 6) U.S. Department
of Homeland Security,

Respondents.

S-M-J and J-M-L, Petitioners herein, respectfully move to consolidate the above related cases. The cases involve common facts and legal issues. Thus, the interest of judicial economy and efficiency is served by consolidating the matters.

Opposing counsel has no opposition to this Motion. Therefore, Petitioners respectfully request that the Court order that the cases of *S-M-J v. Bostock et al.*, 6:25-cv-01425-MTK, and *M-L v. Bostock et al.* 6:25-cv-01426-MTK be consolidated as 6:25-cv-01425 with all future pleadings to be filed in Case No. 6:25-cv-01425.

Dated this 18th day of August 2025.

s/ Robert Easton

Robert Easton, OR SBN 203697

s/ Kurt Hermansen

Kurt David Hermansen, CA SBN 166349

Attorneys for Petitioner