

District Judge John H. Chun
Magistrate Judge Brian A. Tsuchida

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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

9 Mohit KUMAR,

10 Petitioner,

11 v.

12 Camilla WAMSLEY et al.,

13 Respondents.

Case No. 2:25-cv-01772-JHC-BAT

**STIPULATION & PROPOSED
ORDER**

Noting Date: October 1, 2025

14 The Parties, by through their counsel of record, jointly submit and stipulate to extend the
15 temporary restraining order (TRO) as revised below, and to revise the briefing schedule on
16 Respondents' return and motion to dismiss. The Parties note that the proposal below is consistent
17 with the extension of the TRO in a related matter that presents similar issues. *See Ramirez*
18 *Tesara v. Wamsley*, No. 2:25-cv-01723-KKE-TLF (W.D. Wash. Sept. 26, 2025), Dkt. 24. They
19 have agreed to a revised briefing schedule as part of negotiations to extend the TRO. The Parties
20 thus respectfully submit that good cause exists for revision of the current briefing schedule,
21 which will avoid further emergency litigation while also ensuring that this matter reaches an
22 expeditious resolution. *See* 28 U.S.C. § 2243.

1 Respectfully submitted this 1st of October, 2025.

2 s/ Matt Adams

Matt Adams, WSBA No. 28287

3 matt@nwirp.org

s/ Leila Kang

Leila Kang, WSBA No. 48048

leila@nwirp.org

4 s/ Glenda M. Aldana Madrid

Glenda M. Aldana Madrid, WSBA No. 46987

5 glenda@nwirp.org

s/ Aaron Korthuis

Aaron Korthuis, WSBA No. 53974

aaron@nwirp.org

6 NORTHWEST IMMIGRANT
RIGHTS PROJECT

7 615 Second Ave., Suite 400

Seattle, WA 98104

8 (206) 957-8611

9 *Counsel for Petitioner*

10 REBECCA S. COHEN

11 Acting United States Attorney

12 s/ Lyndsie R. Schmalz

LYNDSIE R. SCHMALZ, CA #285004

13 Assistant United States Attorney

700 Stewart Street, Suite 5220

14 Seattle, WA 98101-1271

Telephone: (206) 553-2687

15 Fax: (206) 553-0755

Email: lyndsie.r.schmalz@usdoj.gov

16 *Counsel for Federal Respondents*

ORDER

The Temporary Restraining Order, Dkt. 11, is hereby extended until the Court issues an order on the pending petition for a writ of habeas corpus in the matter. Accordingly, the Court ORDERS as follows: Respondents and all their officers, agents, servants, employees, attorneys, and persons acting on their behalf, in active concert or participation with them:

- shall maintain Petitioner's release from custody under the conditions of his release prior to his re-arrest; and
- are prohibited from re-detaining Petitioner without prior approval from this Court unless Petitioner is arrested on new criminal charges or in the event of an extremely compelling and urgent public safety threat.

In addition, the Court ORDERS that the briefing schedule on this matter is amended as follows:

- Petitioner's traverse and response to the motion to dismiss is due October 9, 2025
- Respondents' reply in support of their motion to dismiss is due October 12, 2025
- The Clerk shall re-note this matter for the Court's consideration on October 12, 2025.

It is so **ORDERED**.

DATED this _____ day of _____, 2025.

The Honorable John C. Chun
UNITED STATES DISTRICT JUDGE