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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10  
11 MOHSEN YOUSEFFI NEJAD,  
12 Petitioner,  
13 v.  
14 CHRISTOPHER J. LAROSA; et al.,  
15 Respondents.

Case No.: 25-cv-02425-AGS-JLB

**JOINT MOTION TO STAY**

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19 The parties, through their respective counsel of record, respectfully request an  
20 order staying this matter. On September 16, 2025, Petitioner filed a petition for writ of  
21 habeas corpus. ECF No. 1. On September 23, 2025, the Court issued an amended order  
22 setting Respondents' response to the petition due on October 2, 2025, and setting  
23 Petitioner's reply in support of the petition due on October 16. ECF No 3. On September  
24 30, 2025, Respondents filed their response in opposition to the petition. ECF No. 5.

25 Since the filing of his petition, factual developments have occurred in Petitioner's  
26 removal proceedings; including the reopening of his removal proceedings pursuant to 8  
27 U.S.C. § 1229a. In light of recent and continuing developments, Petitioner's counsel  
28 has indicated that Petitioner may seek to amend his petition, and the parties are working

1 towards an extrajudicial resolution of this matter. As such, the parties request that this  
2 litigation be stayed until December 16, 2025. If the habeas petition is not dismissed by  
3 December 16, 2025, the parties will file a joint status report.

4  
5 DATED: October 13, 2025

s/ Bashir Ghazialam  
BASHIR GHAZIALAM  
KIRSTEN ZITTLAU  
Attorneys for Petitioner

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9  
10 DATED: October 13, 2025

ADAM GORDON  
United States Attorney

s/Erin M. Dimbleby  
ERIN M. DIMBLEBY  
Assistant U.S. Attorney  
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16 **SIGNATURE CERTIFICATION**

17 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies  
18 and Procedures of the United States District Court for the Southern District of  
19 California, I hereby certify that the content of this document is acceptable Bashir  
20 Ghazialam, counsel for Petitioner, and that I have obtained Mr. Ghazialam's  
21 authorization to affix his electronic signature to this document.

22 DATED: October 13, 2025

s/Erin M. Dimbleby  
ERIN M. DIMBLEBY  
Assistant United States Attorney