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12 Attorneys for Respondents

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 MOHSEN YOUSEFFI NEJAD,
16 Petitioner,
17 v.
18 CHRISTOPHER J. LAROSA; et al.,
19 Respondents.

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

21 **JOINT MOTION TO STAY**

22 The parties, through their respective counsel of record, respectfully request an
23 order staying this matter. On September 16, 2025, Petitioner filed a petition for writ of
24 habeas corpus. ECF No. 1. On September 23, 2025, the Court issued an amended order
25 setting Respondents' response to the petition due on October 2, 2025, and setting
26 Petitioner's reply in support of the petition due on October 16. ECF No 3. On September
27 30, 2025, Respondents filed their response in opposition to the petition. ECF No. 5.

28 Since the filing of his petition, factual developments have occurred in Petitioner's
29 removal proceedings; including the reopening of his removal proceedings pursuant to
30 U.S.C. § 1229a. In light of recent and continuing developments, Petitioner's counsel
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.

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5 DATED: October 13, 2025

6 *s/Bashir Ghazialam*
7 BASHIR GHAZIALAM
KIRSTEN ZITTLAU
8 Attorneys for Petitioner

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10 DATED: October 13, 2025

11 ADAM GORDON
United States Attorney

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13

s/Erin M. Dimbleby
ERIN M. DIMBLEBY
Assistant U.S. Attorney
14 Attorneys for Respondents

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SIGNATURE CERTIFICATION

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

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DATED: October 13, 2025

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