

1 days. In short, this matter would not be ripe for at least six more weeks, plus time for
2 issuance of an R&R, and the parties would have to litigate the matter in a second round
3 of briefing to the District Court through objections to the R&R and reply to the
4 objections.

5 **III. PROPOSED JOINT SCHEDULING**

6 In order to expedite resolution of this matter, Petitioner requests—and the
7 government does not oppose—that the Court withdraw the referral to Magistrate Judge
8 Vaughan to expedite a final ruling by the Court. In addition, Respondents have further
9 agreed to file a return by October 28, 2025, and waive their right to a reply to
10 Petitioner’s response. Petitioner’s response would be due October 31, 2025. The matter
11 would then be noted for October 31, 2025.

12 This motion and request are modeled on orders issued in multiple cases in this
13 district, including in *Tran v. Scott*, 2:25-cv-01886-TMC-BAT (dkt. 8), and
14 *Hambarsonpour v. Bondi*, 2:25-cv-01802-RSM (dkt. 11), which expedited briefing and
15 withdrew the reference to the Magistrate Judge.

16 Counsel has communicated with AUSA Alixandria Morris, who states that the
17 Respondents do not oppose this motion and request.

18 DATED this 24th day of October 2025.

19 Respectfully submitted,

20 *s/ Colin Fieman*
21 Attorney for Vin Hoang Pham

22 I certify this motion contains 354 words in compliance with the Local Civil Rules.
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