

The Honorable Tiffany M. Cartwright

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MONG TUYEN THI TRAN,

Petitioner,

v.

BRUCE SCOTT, et al.,

Respondents.

Case No. 2:25-cv-01886-TMC

STIPULATED MOTION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME

Noted for Consideration:  
October 31, 2025

The Court ordered the parties to meet and confer regarding Petitioner's third-country removal claims and to submit a proposed deadline for any amendments by October 20, 2025. Dkt. 17 at 11. The Court granted the parties an extension of that deadline by two weeks, to November 3, 2025. Dkt. 21. The parties are continuing discussions regarding a possible resolution to this matter. As such, they jointly request an additional extension of three weeks, to November 24. Because Petitioner has been released from custody and because a stipulated order would bar any third-country removal while this case is pending, no harm will result from a brief extension.

1 DATED this 31<sup>st</sup> day of October, 2025.  
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4 Respectfully submitted,

5 CHARLES NEIL FLOYD  
6 United States Attorney

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12 *Attorneys for Federal Respondents*

13 *I certify that this memorandum contains 106*  
14 *words, in compliance with the Local Civil*  
15 *Rules.*

SEATTLE CLEMENCY PROJECT

/s/ Jennifer Pasquarella

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**[PROPOSED] ORDER**

The parties are ORDERED to meet and confer to discuss whether Petitioner will continue to pursue her third-country removal claims and, if so, notify the Court by November 24, 2025, of a proposed deadline for any amendments to Petitioner’s complaint and Respondents’ answer.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
TIFFANY M. CARTWRIGHT  
United States District Judge