

Chief District Judge David G. Estudillo
Magistrate Judge Grady J. Leupold

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

NAPOLEON ANDRES MAGANA,

Petitioner,

v.

KRISTI NOEM, *et al.*,

Respondents.

Case No. 2:25-cv-02100-DGE-GJL

STIPULATED MOTION AND
[PROPOSED] BRIEFING SCHEDULE

Noted for Consideration:
October 28, 2025

Pursuant to this Court's Order (Dkt. No. 3), Petitioner and Respondents submit this proposed briefing schedule. To expedite this habeas matter, the parties agree to forgo the temporary restraining order ("TRO") motion in favor of expedited briefing in consideration of the merits of Petitioner's habeas corpus petition. Dkt. No. 1. This would allow the parties to brief the issues only once and for this Court to rule on the issues once.

The parties propose the following briefing schedule for the habeas petition:

<u>Filing</u>	<u>Deadline</u>
Respondents' Return Memorandum	November 7, 2025
Petitioner's Response	November 24, 2025

1 Respondents agree to not transfer Petitioner to another facility while the habeas petition
2 is pending.

3 The parties further request that this Court forgo with a referral to a magistrate judge in
4 order to expedite a final decision on the habeas petition.

5 Accordingly, the parties request that the Court enter the proposed briefing schedule.

6 DATED this 28th day of October, 2025.

7 Respectfully submitted,

8 CHARLES NEIL FLOYD
United States Attorney

LAW OFFICE OF BRIAN PATRICK CONRY

9 s/ Michelle R. Lambert

s/ Brian Patrick Conry

10 MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
11 United States Attorney's Office
Western District of Washington
12 1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
13 Phone: (253) 428-3824
Fax: (253) 428-3826
14 Email: michelle.lambert@usdoj.gov
Attorneys for Federal Respondents

BRIAN PATRICK CONRY, WSBA #32392
1300 SW 6th Avenue, Ste. 310
Portland, Oregon 97201
Phone: (503) 274-4430
Email: bpconry@gmail.com
Attorney for Petitioner

15 *I certify that this memorandum contains 148*
16 *words, in compliance with the Local Civil*
17 *Rules.*

[PROPOSED] ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit briefing pursuant to the following schedule:

<u>Filing</u>	<u>Deadline</u>
Respondents' Return Memorandum	November 7, 2025
Petitioner's Response	November 24, 2025

Respondents shall not transfer Petitioner to any other facility until this Court decides the habeas petition.

DATED this ____ day of _____, 2025

DAVID G. ESTUDILLO
United States Chief District Judge