

District Judge Ricardo S. Martinez  
Magistrate Judge Brian A. Tsuchida

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LLIMMY RODRIGUEZ JIMENEZ,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 2:25-cv-02167-RSM-BAT

STIPULATED MOTION AND  
[PROPOSED] BRIEFING SCHEDULE

Pursuant to this Court’s Order (Dkt. No. 3), Petitioner and Federal Respondents<sup>1</sup> 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 17, 2025
Petitioner’s Response	December 1, 2025

<sup>1</sup> Respondent Bruce Scott is not a federal employee and not represented by undersigned counsel.

1 Federal Respondents agree to not remove Petitioner from the United States or transfer him  
2 to another facility without providing his counsel with at least 48 hours notice while the habeas  
3 petition is pending.

4 Petitioner agrees to withdraw the pending TRO motion. Dkt. No. 2.

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

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

8 DATED this 2nd day of November, 2025.

9 Respectfully submitted,

10 CHARLES NEIL FLOYD  
United States Attorney

GIBBS HOUSTON PAUW

11 s/ Kristin B. Johnson

s/ Hilary Smith

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*Attorneys for Petitioner*

17 *I certify that this memorandum contains*  
18 *192 words, in compliance with the Local*  
*Civil 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 17, 2025
Petitioner's Response	December 1, 2025

The Motion for Temporary Restraining Order (Dkt. No. 2) is withdrawn.

Federal Respondents shall not remove Petitioner from the United States or transfer him to any other facility without providing his counsel with at least 48 hours notice until this Court decides the habeas petition.

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

\_\_\_\_\_  
RICARDO S. MARTINEZ  
United States District Judge