

District Judge Tiffany M. Cartwright
Chief Magistrate Judge Theresa L. Fricke

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

MOISES DAVID BONILLA MEJIA,

Petitioner,

v.

LAURA HERMOSILLO,¹ *et al.*,

Federal Respondents.

Case No. 2:25-cv-02196-TMC-TLF

STIPULATED MOTION AND
[PROPOSED] TRO BRIEFING
SCHEDULE

Noted for Consideration:
November 5, 2025

Pursuant to this Court’s Order (Dkt. No. 3), Petitioner and Federal Respondents submit this proposed briefing schedule. Petitioner filed a motion for a temporary restraining order (“TRO”) motion seeking an order enjoining U.S. Immigration and Customs Enforcement from transferring him out of this District or removing him from the United States while this habeas action is pending. Dkt. No. 2. This Court provisionally granted the TRO to maintain the status quo to allow the Court to review the merits of the motion after full briefing. Pursuant to Local

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Federal Respondents substitute Acting Field Office Director Laura Hermosillo for Camilla Wamsley.

1 Civil Rule 65(b), Federal Respondents must file a response within 48 hours after the motion is
2 served. There is good cause for this Court to enter an alternative briefing schedule.

3 The parties have conferred and have agreed to and propose the following response
4 schedule to allow for both a response to the TRO motion and a reply:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to the TRO Motion	November 7, 2025 at 5:00pm
Petitioner's reply in support of the TRO Motion	November 12, 2025

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9 This briefing schedule will result in the Court having a more complete record on which to
10 decide the TRO motion. This one-day extension of the response deadline will allow Federal
11 Respondents' time to obtain information necessary to respond to the TRO motion. Furthermore,
12 this schedule will allow Petitioner to reply to Federal Respondents' filing. Finally, due to the
13 provisional TRO granted by the Court, Petitioner cannot be removed or transferred prior to a
14 decision by this Court on the TRO motion.

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

16 DATED this 5th day of November, 2025.

17 Respectfully submitted,

18 CHARLES NEIL FLOYD
United States Attorney

NORTHWEST IMMIGRANT RIGHTS
PROJECT

19 *s/ Michelle R. Lambert*

s/ Christopher Strawn

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2 *Attorneys for Federal Respondents*

3 ***I certify that this memorandum contains 263***
4 ***words, in compliance with the Local Civil***
5 ***Rules.***

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[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>
Federal Respondents' Response to the TRO Motion	November 7, 2025 at 5:00pm
Petitioner's reply in support of the TRO Motion	November 12, 2025

DATED this ____ day of _____, 2025

TIFFANY M. CARTWRIGHT
United States District Judge