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10 *Attorneys for the Federal Respondents*

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 L.M., V.M., and R.L.,

14 Petitioners,

15 v.

16 KRISTI NOEM, in her official capacity as
 Secretary, U.S. Department of Homeland
 Security; U.S. DEPARTMENT OF
 17 HOMELAND SECURITY; PAMELA
 BONDI, in her official capacity as Attorney
 18 General of the United States; U.S.
 DEPARTMENT OF JUSTICE; TODD
 19 LYONS, in his official capacity as Acting
 Director and Senior Official Performing
 20 Duties of the Director for U.S. Immigration
 and Customs Enforcement; JASON
 21 KNIGHT, in his official capacity as Acting
 Field Office Director, Salt Lake City Field
 22 Office Director, U.S. Immigration &
 Customs Enforcement; U.S.
 23 IMMIGRATION & CUSTOMS
 ENFORCEMENT; JOHN MATTOS, in his
 24 official capacity as Warden, Nevada
 Southern Detention Center,

25 Respondents.
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Case No. 2:25-cv-02194-APG-BNW

**Stipulated Briefing Schedule and
 Proposed Scheduling Order**

27 Petitioners and Federal Respondents, by and through their undersigned counsel,
 28 hereby stipulate and jointly request that the Court enter the following briefing schedule on

1 the merits of the Petition for Writ of Habeas Corpus (ECF No. 1), pursuant to the Court’s
2 January 14, 2026, Order (ECF No. 24). This Stipulation is entered into in good faith and
3 not for purposes of delay.

4 **I. STATUS OF THE PROCEEDINGS**

- 5 1. On November 6, 2025, Petitioners filed a Petition for Writ of Habeas Corpus (ECF
6 No. 1) and an Application for a Temporary Restraining Order and Motion for
7 Preliminary Injunction seeking immediate release from custody (ECF No. 2).
- 8 2. Federal Respondents timely opposed Petitioners’ request for preliminary injunctive
9 relief, and the Court held an expedited hearing on the motion. *See* ECF Nos. 16,
10 17.
- 11 3. On January 14, 2026, the Court issued an Order Granting Petitioners’ Motion for
12 Preliminary Injunction, directing that Petitioners be released from custody subject
13 to the conditions of their prior grants of parole. ECF No. 24.
- 14 4. In the same Order, the Court further directed the parties to file a stipulated briefing
15 schedule addressing the merits of the Petition for Writ of Habeas Corpus. ECF No.
16 24.

17 **II. PROPOSED SCHEDULING TO MEET ALL DEADLINES**

18 Pursuant to the Court’s Order, the Parties respectfully propose the following briefing
19 schedule on the merits of the Petition:

- 20 1. Federal Respondents shall file their Response to the Petition for Writ of Habeas
21 Corpus on or before February 20, 2026.
- 22 2. Petitioners shall file their Reply in support of the Petition on or before March 6
23 2026.

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No further briefing is requested absent leave of Court.

IT IS SO STIPULATED

UNLV IMMIGRATION CLINIC

/s/ Michael Kagan
Michael Kagan
Nevada Bar. No. 12318C

/s/ Victoria Callier
Victoria Callier
Student Attorney Practicing
Under Nevada Supreme Court Rule 49.3

/s/ Katrina Pineda
Katrina Pineda
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/s/ Christian R. Ruiz
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VIRGINIA T. TOMOVA
Assistant United States Attorneys

Respectfully submitted this 21st day of January 2026.

IT IS SO ORDERED:

United States District/Magistrate Judge

DATED: _____

