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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE WESTERN DISTRICT OF WASHINGTON**
9 **SEATTLE, WASHINGTON**

10 Pui Sun HO,

11 *Petitioner,*

12 v.

13
14 Kristi NOEM, et al.,

15 *Respondents.*

Case No. 2:25-cv-02222-RSM-MLP

PETITIONER'S UNOPPOSED MOTION
TO AMEND DEADLINES FOR
OBJECTIONS AND RESPONSES TO THE
REPORT AND RECOMMENDATION

Noted for Consideration:
November 25, 2025

16
17 Petitioner moves to amend the deadlines for objections and responses to the Magistrate
18 Judge's Report and Recommendation issued on November 24, 2025. Government counsel has
19 confirmed that Respondents do not oppose this request.

20 Under 28 U.S.C. § 636(b)(1) and Fed. R. Civ. P. 72(b), objections are directed to the
21 District Judge. Under LCR 7(d)(1), this unopposed procedural motion may be noted for same-day
22 consideration.

23 **PETITIONER'S UNOPPOSED MOTION TO**
AMEND DEADLINES FOR OBJECTIONS AND
RESPONSES TO THE REPORT AND
RECOMMENDATION - 1
Case No. 2:25-cv-02222

NOVO LEGAL GROUP, PLLC
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Requested Schedule:

- Objections to the Report and Recommendation:
Friday, November 28, 2025
- Responses to Objections:
Monday, December 1, 2025
- Objections Noted for Consideration:
Monday, December 1, 2025 (completion of briefing)
- If no timely objections are filed, the Report and Recommendation will be ready for consideration by the District Judge on **Friday, November 28, 2025**.

Good cause exists for expedited modification. The Magistrate Judge recommended habeas relief. Petitioner faces imminent and concrete harms if release is delayed, including loss of long-term employment and loss of housing due to the interruption of income. Both parties agree that resolving objections on an expedited timeline is more efficient than parallel emergency motion practice.

Petitioner therefore requests that the Court enter the attached proposed order.

Dated: November 25, 2025

s/ Hannah Hamley

Hannah Hamley

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Respectfully submitted,

s/ Luis Cortes Romero

Luis Cortes Romero

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/s/ Amy Rubenstein

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**PETITIONER'S UNOPPOSED MOTION TO
AMEND DEADLINES FOR OBJECTIONS AND
RESPONSES TO THE REPORT AND
RECOMMENDATION - 2
Case No. 2:25-cv-02222**

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WORD COUNT CERTIFICATION

I, Luis Cortes Romero, certify that this traverse and response contains 182 words, in compliance with the Local Civil Rules.

s/ Luis Cortes Romero
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