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8 Attorneys for Petitioner

9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 CLER BUITRAGO SANCHEZ,  
12  
13 Petitioner,  
14  
15 v.

16 CHRISTOPHER J. LAROSE, Senior  
17 Warden, Otay Mesa Detention Center, San  
18 Diego, California; DANIEL A.  
19 BRIGHTMAN, Field Office Director, San  
20 Diego Office of Detention and Removal, U.S.  
21 Immigrations and Customs Enforcement; U.S.  
22 Department of Homeland Security; TODD M.  
23 LYONS, Acting Director, Immigration and  
24 Customs Enforcement, U.S. Department of  
25 Homeland Security; SIRCE OWEN, Acting  
26 Director for Executive Office for Immigration  
27 Review; KRISTI NOEM, Secretary, U.S.  
28 Department of Homeland Security; PAM  
BONDI, Attorney General of the United  
States,

Respondents.

Case No.: 3:25-cv-03024-BJC-BLM  
JOINT MOTION SEEKING  
BRIEFING SCHEDULE AND  
OSC HEARING

1 The parties, through their counsel of record, respectfully request an order  
2 setting a briefing schedule and Order to Show Cause “OSC” hearing (if the Court  
3 should deem it necessary and/or helpful) in this matter. On November 6, 2025,  
4 Petitioner filed a petition for writ of habeas corpus. ECF No. 1. To date no briefing  
5 schedule or OSC hearing has been scheduled by the Court.

6 As such, the parties respectfully request the issuance of a briefing schedule  
7 and OSC hearing as follows: The parties jointly propose that Respondents be  
8 provided with 14 days upon which to file their return, and that the Petitioner is  
9 given an additional 7 days upon which to file a traverse. If this Court should deem  
10 an OSC hearing necessary and/or helpful in these proceedings, the parties jointly  
11 propose that the Court set an OSC hearing per the Court’s soonest availability after  
12 the filing of the traverse.

13  
14 DATED: December 3, 2025

Respectfully submitted,  
ADAM GORDON  
United States Attorney

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17 *s/Erin Dimbleby*  
Erin Dimbleby  
Assistant United States Attorney  
Attorneys for Respondents

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20 DATED: December 2, 2025

*s/Kirsten Zittlau*  
Kirsten Zittlau  
Bashir Ghazialam  
Attorneys for Petitioners

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22  
23 **SIGNATURE CERTIFICATION**

24  
25 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and  
26 Procedures of the United States Court for the Southern District of California, I certify  
27  
28

1 that the content of this document is acceptable to all signatory counsel and that I have  
2 obtained the required authorization to affix their electronic signature(s) to this  
3 document.  
4

5 DATED: December 2, 2025

Respectfully,  
  
s/Kirsten Zittlau  
Kirsten Zittlau  
zittlaulaw@gmail.com

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