

District Judge Tiffany M. Cartwright
Magistrate Judge Grady J. Leupold

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

TAN HOANG BUI,

Petitioner,

v.

BRUCE SCOTT, *et al.*,

Respondents.

Case No. 2:25-cv-02268-TMC-GJL

STIPULATED MOTION AND
[PROPOSED] TRO BRIEFING
SCHEDULE

Noted for Consideration:
November 14, 2025

Pursuant to this Court's Order (Dkt. No. 3), Petitioner and Federal Respondents¹ submit this proposed briefing schedule for Petitioner's motion for a temporary restraining order ("TRO") (Dkt. No. 2). The parties have conferred and have agreed to and propose the following response 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 18, 2025
Petitioner's reply in support of the TRO Motion	November 19, 2025

¹ Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 This briefing schedule will result in the Court having a more complete record on which to
2 decide the TRO motion. This short extension of the response deadline will allow Federal
3 Respondents' counsel time to obtain information necessary to respond to the TRO motion.
4 Furthermore, this schedule will allow Petitioner to reply to Federal Respondents' filing.

5 U.S. Immigration and Customs Enforcement stipulates and agrees to not remove Petitioner
6 to any country other than Vietnam while this case is pending.

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

8 DATED this 14th day of November, 2025.

9 Respectfully submitted,

10 CHARLES NEIL FLOYD
United States Attorney

JEFFREY C. GONZALES
Attorney for Petitioner

11 /s/ Michelle R. Lambert

/s/ Jeffrey C. Gonzales

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16 *Attorneys for Federal Respondents*

17 *I certify that this memorandum contains 186*
18 *words, in compliance with the Local Civil*
19 *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>
Federal Respondents' Response to the TRO Motion	November 18, 2025
Petitioner's reply in support of the TRO Motion	November 19, 2025

The Government shall not not remove Petitioner to any country other than Vietnam while this case is pending.

DATED this ____ day of _____, 2025.

TIFFANY M. CARTWRIGHT
United States District Judge

Recommended for entry this ____ of _____, 2025.

GRADY J. LEUPOLD
United States Magistrate Judge