



1 WHEREAS, on November 21, 2025, Respondents filed their status report confirming that  
2 Petitioner was released from the custody of United States Immigration and Customs Enforcement on  
3 November 20, 2025, ECF No. 6;

4 WHEREAS, on November 25, 2025, Respondents filed their opposition to petitioner's motion  
5 for preliminary injunction, ECF No. 10, and on November 28, 2025, Petitioner filed her reply to  
6 Respondents' opposition, ECF No. 11;

7 WHEREAS, on December 2, 2025, the Court vacated the hearing on Petitioner's motion set for  
8 December 4, 2025, ECF No. 12, and on December 4, 2025, issued its Order Regarding Preliminary  
9 Injunction, granting the preliminary injunction and directing the parties to "jointly propose by December  
10 29, 2025, a briefing schedule on the petition for a writ of habeas corpus," ECF No. 13;

11 NOW, THEREFORE, the parties STIPULATE and respectfully REQUEST that the Court set the  
12 following briefing schedule with respect to the habeas petition (ECF No. 1), in order to give the parties  
13 time to fully brief the issues presented in this case:

- 14 • Respondents' return is due no later than February 20, 2026;
- 15 • Petitioner's traverse is due no later than March 20, 2026; and
- 16 • A hearing thereafter will be set by the Court subject to its availability;

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18 Dated: December 23, 2025

Respectfully submitted,

CRAIG H. MISSAKIAN  
United States Attorney

/s/ Savith Ivengar  
SAVITH IYENGAR  
Assistant United States Attorney

Attorneys for Respondents

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24 Dated: December 23, 2025

\*\*/s/ Jonathan Abel  
JONATHAN ABEL

Attorney for Petitioner

\*\* In compliance with Civil Local Rule 5-1(i)(3),  
the filer of this document attests under penalty  
of perjury that all signatories have concurred in  
the filing of this document.

**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS SO ORDERED. Respondents shall file a return to the habeas petition (ECF No. 1) no later than **February 20, 2026**. Petitioner shall file a traverse no later than **March 20, 2026**. The Court sets a hearing on the merits of the habeas petition for \_\_\_\_\_.

Dated: \_\_\_\_\_, 2025

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HON. JAMES DONATO  
United States District Judge