

District Judge Jamal N. Whitehead
Magistrate Judge Michelle L. Peterson

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

ABEL MARTINEZ ALEMAN a/k/a PEDRO
RIVERA,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 2:25-cv-02346-JNW-MLP

STIPULATED MOTION AND
[PROPOSED] TRO BRIEFING
SCHEDULE

Noted for Consideration:
November 25, 2025

Pursuant to this Court’s Order (Dkt No. 8), Petitioner and Federal Respondents¹ submit this proposed briefing schedule for Petitioner’s motion for a temporary restraining order (“TRO”). Dkt. No. 2, TRO Mot. Petitioner is a civil detainee at the Northwest ICE Processing Center (“NWIPC”) in Tacoma, Washington. The TRO motion asks this Court to enjoin Respondents from removing him from the United States or transferring him out of the NWIPC during the pendency of these proceedings. TRO Mot., at 15. This Court provisionally granted Petitioner’s TRO motion and has prohibited Respondents from removing Petitioner from the United States or this District without further order. Order, at 3. The parties understand this to be in effect until this

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

1 Court decides the TRO motion. Pursuant to Local Civil Rule 65(b), Federal Respondents must
2 file a response within 48 hours after the motion is served. There is good cause for this Court to
3 enter an alternative briefing schedule.

4 The parties have conferred and have agreed to and propose the following response schedule
5 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	December 1, 2025
Petitioner's reply in support of the TRO Motion	December 4, 2025

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

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

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1 DATED this 25th day of November, 2025.

2 Respectfully submitted,

3 CHARLES NEIL FLOYD
United States Attorney

FENNEMORE CRAIG, P.C.

4 s/ Michelle R. Lambert

s/ Alycia T. Moss

5 MICHELLE R. LAMBERT, NYS #4666657

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9 *Attorneys for Federal Respondents*

10 *I certify that this memorandum contains 286*
11 *words, in compliance with the Local Civil*
12 *Rules.*

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[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	December 1, 2025
Petitioner's reply in support of the TRO Motion	December 4, 2025

DATED this ____ day of _____, 2025

JAMAL N. WHITEHEAD
United States District Judge

Recommended for entry this ____ of _____, 2025.

MICHELLE L. PETERSON
United States Magistrate Judge