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11 *Pro Bono Attorneys for Petitioner*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 A.F.A.M.,

16 Petitioner,

17 v.

18 SERGIO ALBARRAN, Field Office Director of
19 the San Francisco Immigration and Customs
20 Enforcement Office, et al.,

21 Respondents.

Case No. 3:25-cv-10492-AMO

**STIPULATION REGARDING
BRIEFING SCHEDULE FOR HABEAS
PETITION; [PROPOSED] ORDER**

22 Having met and conferred, and pursuant to Civil Local Rules 6-2(a) and 7-12 and this
23 Court's Order Regarding Preliminary Injunction, Petitioner and Respondents, through their
24 undersigned counsel of record, hereby STIPULATE and respectfully REQUEST as follows:

WHEREAS, on December 6, 2025, a petition for writ of habeas corpus and motion for
temporary restraining order were filed, Docs. 1 & 2, and on that same date the Court granted
the temporary restraining order, Doc. 4;

WHEREAS, on December 22, 2025, this Court conducted a hearing on and granted the
request for preliminary injunction and ordered the parties to file "a joint statement with a

**STIPULATION REGARDING BRIEFING SCHEDULE FOR HABEAS PETITION;
[PROPOSED] ORDER, 3:25-cv-10492-AMO**

1 proposed case management scheduled,” Doc. 19;

2 NOW, THEREFORE, the parties STIPULATE and respectfully REQUEST that the
3 Court set the following briefing scheduled with respect to the habeas petition, in order to give
4 the parties time to fully brief the issues presented in this case:

- 5 • Respondents’ return is due no later than January 30, 2026;
- 6 • Petitioner’s traverse is due no later than February 27, 2026; and
- 7 • A hearing thereafter will be set by the Court subject to its availability;

8
9 Dated: December 29, 2025

Respectfully submitted,

10 /s/Jonathan Abel
11 JONATHAN ABEL
Attorney for Petitioner

12 Dated: December 29, 2025

CRAIG H. MISSAKIAN

United States Attorney

14 **/s/ William Skewes-Cox
15 WILLIAM SKEWES-COX
Special Assistant United States Attorney

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17 ** In compliance with Civil Local Rule 5-
18 1(i)(3), the filer of this document attests
19 under penalty of perjury that all
20 signatories have concurred in the filing of
21 this document.

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[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED. Respondents shall file a return to the habeas petition (Doc. 1) no later than January 30, 2026. Petitioner shall file a traverse no later than February 27, 2026. The Court sets a hearing on the merits of the habeas petition for _____.

Dated: _____, 2025

HON. ARACELI MARTÍNEZ-OLGUÍN
United States District Judge