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7 *Attorney for Petitioner*

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 SEATTLE DIVISION

11 JORGE ANGEL LUNA,
12 Petitioner,

13 vs.

14 KRISTI NOEM, Attorney General of
15 the United States, et al.,
16 Respondents.

No. 2:25-cv-02504-DGE-SKV

UNOPPOSED MOTION FOR
BRIEFING SCHEDULE AND
PETITIONER'S REQUEST FOR
ADVANCED NOTICE OF TRANSFER
OUTSIDE JUDICIAL DISTRICT

Note on Motion Calendar: December 9,
2025

17 Petitioner, Mr. Jorge Angel Luna, respectfully requests the following briefing
18 schedule in order to expedite a ruling by this Court and to avoid duplicative briefing.

19 On December 9, 2025, Petitioner filed a § 2241 habeas petition. Dkt. Entry 1. To
20 avoid multiple rounds of briefing on the petition, Petitioner suggests the following
21 briefing schedule:

22 Respondents will file a response to the habeas petition no later than 14 days
23 after the petition was received by the U.S. Attorney's Office.

24 Petitioner may file a reply to the response no later than 5 days after the response
25 is filed.

1 The Court will note the habeas petition for the same day as Petitioner's reply.

2 Petitioner further requests that the Court terminate a referral to Magistrate Judge,
3 such that a final ruling by the Court is expedited.

4 The Office of the Federal Public Defender has conferred with the U.S.
5 Attorney's Office about the above requests. The U.S. Attorney's Office, through
6 Assistant United States Attorney Katherine Collins, has indicated that the U.S.
7 Attorney's Office does not oppose the above requested relief.

8 Finally, Petitioner asks the Court to order that the while the habeas petition is
9 pending, Respondents shall not remove him from the United States or transfer him to
10 another facility without providing Petitioner's counsel with at least 48-hours notice of
11 the removal or transfer. (Including that if 48-hour period would expire on a weekend or
12 legal holiday, the period continues to run until the same time on the next day that is not
13 a weekend or legal holiday.) The U.S. Attorney's Office has indicated that it takes no
14 position and defers to the Court on this request.

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16 Dated: December 9th, 2025

s/ Benjamin Cornell
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23 I certify this motion contains 401 words in compliance with the Local Civil Rules.