

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HUMBERTO JIMENEZ-PEREZ,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT FIELD OFFICE  
DIRECTOR,

Respondent(s).

No. 2:25-cv-02631-JLR

STIPULATED MOTION FOR LEAVE TO  
AMEND PETITION AND TO AMEND  
BRIEFING SCHEDULE

NOTED FOR: January 13, 2026

Petitioner Humberto Jimenez-Perez filed a habeas corpus petition *pro se* challenging his detention at the Northwest ICE Processing Center. (Dkt. No. 1). On December 31, 2025, the Court issued a briefing schedule. (Dkt. No. 4). On January 12, 2026, counsel entered an appearance on behalf of the Petitioner. (Dkt. No. 5).

By and through counsel of record, the parties propose an amended briefing schedule to (1) permit the Petitioner to seek leave to file an amended petition, and (2) proceed with an amended briefing schedule as follows:

- o Petitioner will file his amended petition by January 23, 2026.
- o Respondents will file their return on the habeas by February 6, 2026.
- o Petitioner will file his reply by February 11, 2026.

///

///

///

STIPULATED MOTION FOR LEAVE TO AMEND PETITION AND  
TO AMEND BRIEFING SCHEDULE - 1

No. 2:25-cv-02631-JLR

MACDONALD HOAGUE & BAYLESS  
705 Second Avenue, Suite 1500  
Seattle, Washington 98104  
Tel 206.622.1604 Fax 206.343.3961

DATED this 13th day of January 2026.

Respectfully submitted,

MacDONALD HOAGUE & BAYLESS	UNITED STATES ATTORNEY'S OFFICE – WESTERN DISTRICT OF WASHINGTON
By: <u>/s/ Lauren Freidenberg-McBride</u> Lauren I. Freidenberg-McBride, WSBA #59145 <u>LaurenF@mhb.com</u> 705 Second Avenue, Suite 1500 Seattle, WA 98104	By: <u>/s/ Katherine Collins</u> Katherine Collins, CA #315903 <u>Katherine.Collins@usdoj.gov</u> 700 Stewart Street Seattle, WA 98101

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

CERTIFICATE OF SERVICE

I, Andrew Drake, declare under penalty of perjury under the laws of the United States of America that I caused to be served in the manner noted below a copy of the document entitled Stipulated Motion to Amend Petition and to Amend Briefing Schedule on the following participant(s):

<p>CHARLES NEIL FLOYD  United States Attorney  Katherine G. Collins, CA # 315903  Assistant United States Attorney  United States Attorney's Office  Western District of Washington  700 Stewart Street, Suite 5220  Seattle, WA 98101-1271  Phone: 206-553-7970  Fax: 206-553-4067  Katherine.Collins@usdoj.gov</p> <p>Attorney(s) for Respondent</p>	<p><input type="checkbox"/> via facsimile  <input type="checkbox"/> via overnight mail  <input type="checkbox"/> via first-class U.S. mail  <input type="checkbox"/> via hand delivery  <input checked="" type="checkbox"/> via Court ECF system  <input type="checkbox"/> via email:</p>
--	---

DATED this 13th day of August, 2026, at Seattle, Washington.

/s/Andrew Drake  
Andrew Drake, Legal Assistant