

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KHOUNG QUANG LE,

Petitioner,

v.

PAMLEA BONDI, *et al.*,

Respondents.

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CASE NO. 4:25-cv-6180

AGREED PROPOSED SCHEDULE

Pursuant to the Court's Order, Dkt. 8, the Parties conferred about a schedule for the resolution of this case. The Parties jointly propose that Federal Respondents file a response/dispositive motion by January 22, 2026, and that Petitioner will file a reply, if any, by January 27, 2026. After that briefing, the Parties agree that this case will be ripe for resolution.

This Court has also ordered Federal Respondents to file an evidentiary filing by January 19, 2026. Dkt. 9. As January 19th is a federal holiday, Federal Respondents were going to request a resetting of that deadline. However, in light of the agreement regarding a schedule to resolve this case, Federal Respondents request that their brief proposed to be filed on January 22, 2026, include the evidentiary material requested and any other argument. Petitioner is not opposed to this request.

The Parties submit a proposed order consistent with their agreement.

Dated: January 15, 2026

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

s/Jimmy A. Rodriguez
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Attorney for Federal Respondents

CERTIFICATE OF COMPLIANCE

I certify that the forgoing document has 153 words in Garamond 13-point font, excluding the caption, tables, signature block, this certificate, and certificate of service.

s/Jimmy Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney

CERTIFICATE OF CONFERENCE

Counsel for Federal Respondents conferred with Petitioner's counsel. The parties agreed to the proposal in the is filing.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on January 15, 2026, the foregoing was filed and served on counsel of record through the Court's CM/ECF system.

s/ Jimmy A. Rodriguez _____
Jimmy A. Rodriguez
Assistant United States Attorney