

District Judge Thomas S. Zilly

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

G.S.,

Petitioner,

v.

JULIO HERNANDEZ,¹ *et al.*,²

Respondents.

Case No. 2:25-cv-02704-TSZ

STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO MOTION FOR BILL OF COSTS

Noted for Consideration:
April 3, 2026

JOINT STIPULATION

The Parties, through undersigned counsel, jointly file this stipulation asking the Court to extend the deadline for the filing of Federal Respondents' Response to Petitioner's Motion for Bill of Costs until April 17, 2026, and Petitioner's reply until April 24, 2026. A brief extension

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Federal Respondents substitute Julio Hernandez for Laura Hermosillo.

² Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

Pursuant to Fed. R. Civ. P. 25(d), Federal Respondents substitute Department of Homeland Security Secretary Markwayne Mullin for Kristi Noem.

Pursuant to Fed. R. Civ. P. 25(d), Federal Respondents substitute Acting United States Attorney General Todd Blanche for Pamela Bondi.

1 will allow Federal Respondents additional time to complete their work on certain pending
2 applications and allow the Parties additional time to discuss the remaining issues.

3 Petitioner filed a Motion for Bill of Costs on February 26, 2026. Dkt. 13. Pursuant to LCR
4 7(d)(3), Federal Respondents' response to the motion was due on March 13, 2026. On March 13,
5 2026, Federal Respondents filed an Unopposed Motion and Proposed Order for Extension of
6 Time to Respond to Motion for Bill of Costs, advising the Court that undersigned counsel had
7 communicated with Petitioner's counsel concerning a request to extend the deadline, after he
8 indicated that he will be unopposed to a motion to extend the response deadline to afford the
9 Parties additional time to discuss the potential of resolving this matter. However, the Parties did
10 not yet come to an agreed, proposed deadline for the motion at that time. Dkt. 14. Federal
11 Respondents previously submitted that there was good cause for a brief extension of Federal
12 Respondents' time to respond to the motion and requested that the Court extend that deadline
13 until April 3, 2026, and all other case deadlines by 21 days. *Id.*

14 On March 26, 2026, this Court granted the Unopposed Motion and Proposed Order for
15 Extension of Time to Respond to Motion for Bill of Costs, extending Federal Respondents'
16 response deadline to April 3, 2026, and Petitioner's reply deadline to April 10, 2026. Dkt. 15.

17 The Parties now stipulate to extend Federal Respondents' response to Petitioner's Motion
18 for Bill of Costs until April 17, 2026, and Petitioner's reply deadline until April 24, 2026. There
19 is good cause for a brief extension of Federal Respondents' time to respond to the motion. The
20 Parties have discussed the potential of resolving this matter short of further litigation, and if the
21 Parties' efforts are successful, it will save the Parties and the Court time and resources.

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1 DATED this 3rd day of April, 2026.

2 Respectfully submitted,

3 s/ Bart Klein

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Attorney for Federal Respondents

I certify that this memorandum contains 358 words, in compliance with the Local Civil Rules.

[PROPOSED] ORDER

It is hereby ORDERED that the Parties' Stipulated Motion for Extension of Time to Respond to Motion for Bill of Costs is GRANTED.

DATED this ____ day of _____, 2026.

THOMAS S. ZILLY
United States District Judge