

District Judge James L. Robart

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

HABIB ABDOULAYE,

Petitioner,

v.

PAMELA BONDI, *et al.*,¹

Respondents.

Case No. 2:26-cv-00078-JLR

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

Noted for Consideration:
March 3, 2026.

JOINT STIPULATION

The Parties, through undersigned counsel, jointly file this stipulation asking the Court to extend the deadline for the filing of Petitioner's Traverse until March 9, 2026.

Pursuant to the Court's Scheduling Order (Dkt. 14), Petitioner's traverse is due on March 4, 2026. The Parties have agreed to extend the deadline until March 9, 2026, in order for Federal Respondents to facilitate Petitioner's removal flight. Therefore, the Parties submit there is good cause for a brief extension of Petitioner's traverse deadline and have stipulated to extend that deadline until March 9, 2026.

¹ Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 In addition, the parties stipulate that, if Mr. Abdoulaye is not removed by the currently
2 predicated date of March 5, 2026, he may (but need not) have additional time to respond on certain
3 issues Specifically, he may limit his traverse solely to the issue pertaining to *Zadvydas v. Davis*,
4 533 U.S. 678 (2001), and that if the Court should grant the petition, Mr. Abdoulaye may file a
5 traverse pertaining to the issues of re-detention and third-country removal within one week of the
6 petition being granted. The parties so stipulate in order to conserve litigant and judicial resources
7 and to accommodate Mr. Abdoulaye's counsel, who is currently on medical leave.

8 **SO STIPULATED.**

9 Dated this 3rd day of March, 2026.

10 Respectfully submitted,

11 s/ Alixandria K. Morris

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21 *Attorney for Federal Respondents*

22 I certify that this memorandum contains 204
23 words, in compliance with the Local Civil Rules.

24 s/ Alan Zarky

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Attorney for Petitioner

[PROPOSED] ORDER

It is hereby ORDERED that the parties' motion is GRANTED. Petitioner shall file their Traverse by March 9, 2026. In addition, he may limit his traverse solely to the issue pertaining to *Zadvydas v. Davis*, 533 U.S. 678 (2001), and that if the Court should grant the petition, Mr. Abdoulaye may file a traverse pertaining to the issues of re-detention and third-country removal within one week of the petition being granted.

DATED this _____ day of _____, 2026.

JAMES L. ROBART
United States District Judge