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23 **UNITED STATES DISTRICT COURT**
24 **SOUTHERN DISTRICT OF CALIFORNIA**

25 HENRRY AMAYA-INGLES

26 Petitioner,

27 v.

28 KRISTI NOEM, Secretary of the
Department of Homeland Security; *et al.*,

Respondents.

Case No.: 25-cv-02223-RBM-MMP

JOINT MOTION TO STAY

29 The parties, through their respective counsel of record, respectfully request an
30 order staying this matter. On April 8, 2026, Petitioner filed a petition for writ of habeas
31 corpus. ECF No. 1. Previously, on January 29, 2026, Petitioner filed a Petition for Writ
32 of Habeas Corpus under 28 U.S.C. § 2241 in the U.S. District Court for the District of
33 Arizona. *See Amaya-Ingles v. United States of America; et al.*, No. 2:26-cv-00563-

1 AMM (D.Ariz.), ECF No. 1. On April 29, 2026, Respondents filed a Notice of Habeas
2 Relief informing the Court that Petitioner has already been granted the relief he seeks
3 in the instant petition. Since the filing of that notice, the parties have met and conferred
4 regarding Petitioner's habeas petition in Arizona and discovered that the District Judge
5 in Arizona has not yet adopted the Magistrate Judge's recommendation for relief in
6 Petitioner's habeas petition.¹

7 As such, the parties request that this litigation be stayed until May 16, 2026. If
8 the habeas petition is not dismissed by May 16, 2026, the parties will file a joint status
9 report.

10 DATED: April 30, 2026

11 s/ Camille B. Fenton
12 CAMILLE B. FENTON
13 Federal Defenders of San Diego, Inc.
14 Attorneys for Petitioner

15 DATED: April 30, 2026

16 ADAM GORDON
17 United States Attorney

18 s/ Camille Savedra
19 CAMILLE SAVEDRA
20 MICHAEL WALLACE
21 Assistant U.S. Attorneys
22 Attorneys for Respondents

23 **SIGNATURE CERTIFICATION**

24 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
25 and Procedures of the United States District Court for the Southern District of
26 California, I hereby certify that the content of this document is acceptable to Camille
27 Fenton, counsel for Petitioner, and that I have obtained Ms. Fenton's authorization to
28 affix her electronic signature to this document.

DATED: April 30, 2026

s/ Camille Savedra
CAMILLE SAVEDRA

¹ Respondents respectfully apologize for inadvertently stating that Petitioner had already received habeas relief.