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7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

9 LUIS RAUL ALMENTERO VALDES,

10 Petitioner,

11 v.

12 DEPARTMENT OF HOMELAND
SECURITY; *et al.*,

13 Respondents.
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Case No. 26-cv-02444-BJC-BLM

**JOINT MOTION TO
PARTIALLY VACATE
COURT'S ORDER [ECF No. 4]**

17 On April 16, 2026, Petitioner filed a petition for writ of habeas corpus pursuant
18 to 28 U.S.C. § 2241 in which he challenges his detention by Immigration and Customs
19 Enforcement (ICE). ECF No. 1. On April 22, 2026, the Court issued an Order that
20 conditionally appointed Federal Defenders of San Diego Inc. as counsel, set certain
21 filing deadlines, and enjoined Respondents from removing Petitioner from the United
22 States or this District. ECF No. 4. Respondents' counsel and Petitioner's counsel have
23 conferred on Respondents' recent efforts toward removing Petitioner from the United
24 States to Cuba. For instance, Respondents expect to schedule Petitioner on a removal
25 flight to Cuba no later than July 30, 2026.

26 Based on the foregoing, the parties request that the Court issue an order:
27 (1) partially vacating its April 22, 2026 Order, ECF No. 4; (2) confirming that
28 Respondents are *not* precluded from removing Petitioner to Cuba, and only Cuba,

1 during the pendency of this habeas action; (3) staying these proceedings; and (4) setting
2 a deadline of August 7, 2026 for Respondents to file a status report regarding whether
3 Petitioner has been removed.

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5 Dated: June 26, 2026

Respectfully submitted,

6 s/ Zandra Lopez

ZANDRA LOPEZ

7 Federal Defenders of San Diego, Inc.
8 Attorney for Petitioner

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10 Dated: June 26, 2026

Respectfully submitted,

11 ADAM GORDON

12 United States Attorney

13 s/Camille Savedra

CAMILLE SAVEDRA

14 Assistant United States Attorney
15 Attorneys for Respondents

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17 **SIGNATURE CERTIFICATION**

18 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
19 and Procedures of the United States District Court for the Southern District of
20 California, I hereby certify that the content of this document is acceptable to Zandra
21 Lopez, counsel for Petitioner, and that I have obtained Ms. Lopez's authorization to
22 affix her electronic signature to this document.

23 Dated: June 26, 2026

24 s/Camille Savedra

CAMILLE SAVEDRA

25 Assistant United States Attorney
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