

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Mario ALMONTE HERNANDEZ et
al.,

Petitioners,

v.

Laura HERMOSILLO et al.,

Respondents.

Case No. 2:25-cv-2464

**UNOPPOSED MOTION FOR
EXPEDITED BRIEFING
SCHEDULE**

Note on Motion Calendar:
December 5, 2025

Petitioners respectfully request the following briefing schedule in order to expedite a ruling by this Court and to avoid duplicative briefing. Petitioners note that this case is an action to enforce the declaratory judgment in *Rodriguez Vazquez v. Hermosillo*, No. 3:25-cv-05240-TMC, and therefore should not require the Court to address any substantive issues.

On December 5, Petitioner filed this § 2241 habeas petition. Dkt. 1. To avoid multiple rounds of briefing on the petition and to provide expeditious resolution of this matter, Petitioners suggest the following briefing schedule:

- Respondents will file a response to the habeas petition no later than 3 business days after the petition was received by the U.S. Attorney's Office. Petitioners have provided copies of the habeas petition to the U.S. Attorney's Office contemporaneously with this filing.

- Petitioners may file a reply to the response no later than 1 business day after the response is filed.

- The Court will note the habeas petition for the same day as Petitioner's reply.

Petitioners' counsel has conferred with the U.S. Attorney's Office about the above requests. The U.S. Attorney's Office, through Civil Chief Rebecca S. Cohen, has indicated that the U.S. Attorney's Office does not oppose the above requested briefing schedule.

Finally, Petitioners request the Court to order that the while the habeas petition is pending, Respondents shall not remove Petitioners from the United States or transfer Petitioners to another facility without providing Petitioner's counsel with at least 48-hour notice of the removal or transfer (including that if 48-hour period would expire on a weekend or legal holiday, the period continues to run until the same time on the next day that is not a weekend or legal holiday.) The U.S. Attorney's Office has indicated that it takes no position and defers to the Court on this request.

Respectfully submitted this 5th day of December, 2025.

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Counsel certifies that this motion contains 299 words, in compliance with the Local Civil Rules.

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