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9 N.D.N.

10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION

13 N.D.N.,

14 Petitioner-Plaintiff,

15 v.

16 Sergio ALBARRAN, Acting Field Office Director
17 of San Francisco Office of Detention and Removal,
18 U.S. Immigrations and Customs Enforcement; U.S.
19 Department of Homeland Security;

20 Todd M. LYONS, Acting Director, Immigration
21 and Customs Enforcement, U.S. Department of
22 Homeland Security;

23 Kristi NOEM, in her Official Capacity, Secretary,
24 U.S. Department of Homeland Security;

25 Pam BONDI, in her Official Capacity, Attorney
26 General of the United States; and

27 Tonya Andrews, Facility Administrator at Golden
28 State Annex Detention Center, McFarland,
California;

Respondents-Defendants.

Case No.: 1:25-cv-01587-DAD-CKD

**JOINT MOTION FOR
PROPOSED BRIEFING
SCHEDULE; AND [PROPOSED]
ORDER**

Challenge to Unlawful Incarceration
Under Color of Immigration
Detention Statutes

Pursuant to Civil Local Rule 144(a), Petitioner and Respondents hereby respectfully propose and request that the Court grant this Joint Motion for the briefing schedule on the motion for preliminary injunction.

The parties respectfully request that the Court grant this Joint Motion for the briefing schedule:

(1) Petitioner's deadline to file a Motion for Preliminary Injunction will be Tuesday, December 9, 2025;

(2) Respondents' deadline to file response to motion will be Thursday, December 11, 2025; and

(3) Petitioner's deadline to file a reply if needed will be Friday, December 12, 2025

(4) and if a hearing is necessary, the parties respectfully request that a hearing date be set for after Monday, January 12, 2026.

DATED: December 4, 2025

Respectfully submitted,

VAN DER HOUT LLP

/s/ Avantika Shastri
AVANTIKA SHASTRI*

Attorney for Petitioner N.D.N.

ERIC GRANT
United States Attorney

/s/Nicholas M. Fogg
NICHOLAS M. FOGG
Assistant United States Attorney

Attorneys for Respondents Sergio Albarran
et al.

* In compliance with Civil Local Rule 131(e), the filer attests that all signatories have concurred in the filing of this document.

1 PURSUANT TO JOINT MOTION, IT IS SO ORDERED that Petitioner's deadline to file a
2 Motion for Preliminary Injunction is Tuesday, December 9, 2025; Respondents' deadline to file
3 response to motion is Thursday, December 11, 2025; and Petitioner's deadline to file a reply if
4 needed is Friday, December 12, 2025. If necessary, a hearing will be set after Monday, January
5 12, 2026, or on _____.

6
7
8 DATED: December __, 2025

Hon. Dale A. Drozd
United States District Judge