

DISTRICT JUDGE TANA LIN  
CHIEF MAGISTRATE JUDGE THERESA L FRICKE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

|                                    |   |                          |
|------------------------------------|---|--------------------------|
| RAMY KAMAL ELSHOURLBAGY,           | ) | No. CV25-02432-TL-TLF    |
| Petitioner,                        | ) |                          |
| v.                                 | ) | UNOPPOSED MOTION FOR     |
| PAMELA BONDI, Attorney General of  | ) | BRIEFING SCHEDULE        |
| the United States, <i>et al.</i> , | ) |                          |
| Respondents.                       | ) | Note on Motion Calendar: |
|                                    | ) | December 3, 2025         |

Petitioner Ramy Elshourbagy respectfully requests the following briefing schedule in order to expedite a ruling by this Court and to avoid duplicative briefing.

On December 2, 2025, Petitioner filed a § 2241 habeas petition. Dkt. 1. To avoid multiple rounds of briefing on the petition, Petitioner suggests the following briefing schedule.

Respondents will file a response to the habeas petition no later than 14 days after the petition was received by the U.S. Attorney's Office.

Petitioner may file a reply no later than five days after the response is filed.

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

Petitioner further requests that the Court terminate the referral to Chief Magistrate Judge Fricke in order to expedite a final ruling by the Court.

1 The Office of the Federal Public Defender has conferred with the U.S.  
2 Attorney's Office about the above requests. Civil Chief Rebecca S. Cohen has indicated  
3 that the U.S. Attorney's Office does not oppose the above-requested relief.

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

11 DATED this 3rd day of December 2025.

12 Respectfully submitted,

13 s/ *Ann K. Wagner*  
14 Assistant Federal Public Defender  
15 Attorney for Petitioner

16 I certify this motion contains 258 words in compliance with the Local Civil Rules.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26