

District Judge John H. Chun

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CARL TODD,

Petitioner,

v.

PAMELA BONDI, *et al.*,¹

Respondents.

Case No. 2:25-cv-02519-JHC

JOINT MOTION AND [PROPOSED]
BRIEFING SCHEDULE

Noted for consideration:
December 18, 2025

On December 13, 2025, this Court entered a temporary order preventing Petitioner's transfer or removal outside of this jurisdiction while his habeas petition is pending. Dkt. 12. The Court also directed that if Federal Respondents oppose Petitioner's position that he should not be transferred out of this jurisdiction while his petition is pending, the Parties should meet and confer and present an agreed briefing schedule, or opposing schedules, in a joint motion. *Id.*

Pursuant to that Order (Dkt. 12), and because Federal Respondents oppose Petitioner's position that he should not be transferred out of this jurisdiction, Petitioner and Federal Respondents submit this joint proposed briefing schedule for both the merits and the transfer

¹ Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 motion. The Parties conferred via telephone on December 16, 2025, as well as via email
2 correspondence, and have agreed to the following briefing schedule:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Return and Opposition to the Emergency Motion for Order Preventing Transfer During Pendancy of Petition	December 29, 2025
Petitioner's Reply to Federal Respondents' Return and Opposition to the Emergency Motion for Order Preventing Transfer During Pendancy of Petition	January 5, 2026

8 Accordingly, the Parties request the Court enter the proposed briefing schedule.

9 DATED this 18th day of December, 2025

10 Respectfully submitted,

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12 United States Attorney

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Attorney for Petitioner

20 *Attorneys for Federal Respondents*

21 I certify that this memorandum contains 193 words,
22 in compliance with the Local Civil Rules.

[PROPOSED] ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit briefing according to the following schedule:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Return and Opposition to the Emergency Motion for Order Preventing Transfer During Pendency of Petition	December 29, 2025
Petitioner's Reply to Federal Respondents' Return and Opposition to the Emergency Motion for Order Preventing Transfer During Pendency of Petition	January 5, 2026

DATED this ____ day of _____, 2025

JOHN H. CHUN
United States District Judge