

Vicky J Currie, WSBA #24192
Currie Law Firm
1008 S Yakima Ave STE 100
Tacoma, WA 98405
253.588.9922
currielawfirm@gmail.com

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ARIAS PEREZ, PETRA,

Petitioner,

v.

BRUCE SCOTT, Warden of the Northwest ICE
Processing Center;
ALEJANDRO MAYORKAS, Secretary of the
U.S. Department of Homeland Security

Respondents.

CIVIL ACTION NO. 2:25-CV-2558

UNOPPOSED MOTION FOR
BRIEFING SCHEDULE

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

On 12/12/2025, Petitioner filed a § 2241 habeas petition. To avoid multiple rounds of briefing on the petition, the 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 to the response no later than 5 days after the response is filed.

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

1 Petitioner further requests that this Court not refer this case to a Magistrate Judge in order
2 to expedite a final ruling by the Court.

3 The Office of the Federal Public Defender has conferred with the U.S. Attorney's Office
4 about the above requests. The U.S. Attorney's Office, through Civil Chief Rebecca S. Cohen, has
5 indicated that the U.S. Attorney's Office does not oppose the above requested relief.
6

7 Finally, Petitioner asks the Court to order that the while the habeas petition is pending,
8 Respondents shall not remove Petitioner from the United States or transfer Petitioner to another
9 facility without providing Petitioner's counsel with at least 48-hour notice of the removal or
10 transfer (including that if 48-hour period would expire on a weekend or legal holiday, the period
11 continues to run until the same time on the next day that is not a weekend or legal holiday.) The
12 U.S. Attorney's Office has indicated that it takes no position and defers to the Court on this
13 request.
14
15

16 Respectfully submitted this 12th day of December 2025.
17
18

19 /s/Vicky J Currie

20 Vicky J Currie, WSBA #24192
21 Attorney for Petitioners

22 *I certify this motion contains 265 words in compliance with the Local Civil Rules.*
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, Vicky J Currie, certify that on this 12th day of December, 2025, I served true and correct copies of the **UNOPPOSED MOTION FOR BRIEFING SCHEDULE**, together with all supporting exhibits, to be served upon the following Respondents by **United States mail** and/or **electronic service** as permitted:

BRUCE SCOTT

Warden, Northwest ICE Processing Center
1623 East J Street
Tacoma, WA 98421

ALEJANDRO MAYORKAS

Secretary, U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

Required Service on the United States

Michelle R. Lambert

Assistant United States Attorney
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, WA 98101
(via CM/ECF and email, per her request)

Attorney General of the United States

U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 12th day of December 2025.

/s/Vicky J Currie

Vicky J Currie, WSBA #24192
Attorney for Petitioners