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Pro Bono Attorneys for Petitioner

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FULVIO CASTILLO GOMEZ,

Petitioner,

v.

SERGIO ALBARRAN, *et al.*,

Respondents.

Case No. 5:26-cv-01790-NW

STIPULATION AND [PROPOSED] ORDER REGARDING PRELIMINARY INJUNCTION BRIEFING

Pursuant to the Court's instructions at the March 5, 2026 hearing, the parties met and conferred regarding the procedure and schedule for further proceedings in this matter. *See* Civil Local Rules 6-2(a) and 7-12. The parties propose the following schedule to allow full briefing of the issues raised during the March 5, 2026 hearing.

The parties hereby STIPULATE and respectfully REQUEST that the Court enter the following briefing schedule governing Petitioner's Motion for Preliminary Injunction:

1. Petitioner's Motion for Preliminary Injunction shall be filed no later than March 27, 2026;
2. Respondents' Opposition to the Motion for Preliminary Injunction shall be filed no later than

1 April 10, 2026;

2 3. Petitioner's Reply in Support of the Motion for Preliminary Injunction shall be filed no later
3 than April 20, 2026.

4 The Temporary Restraining Order entered on March 3, 2026, ECF No. 6, shall remain in effect
5 pending the Court's resolution of Petitioner's Motion for Preliminary Injunction.

6 The parties respectfully request that the Court set a hearing on the Motion for Preliminary
7 Injunction on April 27, 2026, or on another date convenient for the Court.

8
9 Dated: March 6, 2026

Respectfully submitted,

10 /s/ Jonathan Abel

11 Jonathan Abel
12 Pro Bono Attorney for Petitioner

13
14 Dated: March 6, 2026

/s/ Michael J. Starrett

15 Michael J. Starrett
16 Special Assistant United States Attorney
17 Attorney for Respondents

18 In compliance with Civil Local Rule 5-1(i)(3),
19 the filer of this document attests under penalty
20 of perjury that all signatories have concurred in
21 the filing of this document.
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[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED that:

- Petitioner's Motion for Preliminary Injunction shall be filed no later than **March 27, 2026**;
- Respondents' Opposition to the Motion for Preliminary Injunction shall be filed no later than **April 10, 2026**;
- Petitioner's Reply in Support of the Motion for Preliminary Injunction shall be filed no later than **April 20, 2026**.

The Temporary Restraining Order entered on March 3, 2026, ECF No. 6, shall remain in effect pending the Court's resolution of the Motion for Preliminary Injunction.

The Court sets a hearing on the Motion for Preliminary Injunction for **April 27, 2026**.

Dated: _____, 2026

HON. NOËL WISE
United States District Judge