

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

ROSA PADILLA PAZ,

Petitioner,

v.

JULIO HERNANDEZ, et al.,

Respondents.

Case No. 2:26-cv-1394-BAT

**STIPULATED MOTION TO
EXTEND TEMPORARY
RESTRAINING ORDER AND
[PROPOSED] ORDER**

Noting Date: May 8, 2026

On April 24, 2026, Petitioner Rosa Padilla Paz filed the petition for a writ of habeas corpus in this matter, seeking her release from custody. Dkt. 1. The same day, she filed a motion for a temporary restraining order (TRO). Dkt. 2. Respondents responded to the TRO motion on April 26, Dkt. 10, and Petitioner filed a reply on April 27. On April 29, 2026, the Court granted the motion, ordering Petitioner's release and instructing Respondents not to re-detain Petitioner "pending resolution of the petition for writ of habeas corpus without prior approval from the Court." Dkt. 13 at 16. The Court's order provided that the TRO would remain in effect for 14 days. *Id.*

The parties agree and stipulate to an extension of the TRO for the duration of this case. Good cause exists to extend the TRO, as this petition will be fully briefed as of the same day that

1 the TRO expires. A short extension of the TRO while this Court issues a final decision in this
2 matter will therefore avoid duplicative briefing and preserve both the parties' and the Court's
3 resources.

4 Respectfully submitted this 8th day of May, 2026.

5 s/ Aaron Korthuis
Aaron Korthuis, WSBA No. 53974
6 aaron@nwirp.org

7 s/ Leila Kang
Leila Kang, WSBA No. 48048
8 leila@nwirp.org

9 s/ Matt Adams
Matt Adams, WSBA No. 28287
10 matt@nwirp.org

s/ Hayley Upshaw*
Hayley Upshaw

SAN FRANCISCO PUBLIC
DEFENDER'S OFFICE
555 Seventh Street
San Francisco, CA 94103
Telephone: (415) 754-3762
Email: Hayley.Upshaw@sfgov.org

**Admitted pro hac vice*

11 NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Suite 400
12 Seattle, WA 98104
(206) 957-8611

13 *Counsel for Petitioner*
14

15 s/ Alixandria K. Morris
ALIXANDRIA K. MORRIS, TX No. 24095373
16 Assistant United States Attorney
United States Attorney's Office
17 Western District of Washington
700 Stewart Street, Suite 5220
18 Seattle, Washington 98101
Phone: 206-553-7970
19 Fax: 206-553-4067
Email: alixandria.morris@usdoj.gov

20 *Attorney for Federal Respondents*
21
22
23

[PROPOSED] ORDER

Having considered the parties' stipulation concerning the Temporary Restraining Order in this matter, Dkt. 13, the Court finds that good cause exists to extend the TRO. Accordingly, the Court **ORDERS** that the TRO is extended until the Court issues a final decision on the petition for a writ of habeas corpus.

It is so **ORDERED**.

DATED this _____ day of _____, 2026.

Brian A. Tsuchida
UNITED STATES MAGISTRATE JUDGE