

1 KEKER, VAN NEST & PETERS LLP
 2 STEVEN P. RAGLAND - # 221076
 3 sragland@keker.com
 4 CODY S. HARRIS - # 255302
 5 charris@keker.com
 6 CARLOS C. MARTINEZ - # 354616
 7 cmartinez@keker.com
 8 633 Battery Street
 9 San Francisco, CA 94111-1809
 10 Telephone: 415 391 5400
 11 Facsimile: 415 397 7188

12 AMERICAN CIVIL LIBERTIES UNION
 13 FOUNDATION

14 KYLE VIRGIEN - # 278747
 15 kvirgien@aclu.org
 16 FELIPE HERNANDEZ - # 338468
 17 npp_fhernandez@aclu.org
 18 MARISOL DOMINGUEZ-RUIZ - # 345416
 19 mdominguez-ruiz@aclu.org
 20 425 California Street, 7th Floor
 21 San Francisco, CA 94104
 22 Tel.: (415) 343-0770

23 CARMEN IGUINA GONZALEZ - # 277369
 24 ciguinagonzalez@aclu.org
 25 915 15th Street, NW, 7th Floor
 26 Washington, DC 20005
 27 Tel.: (202) 393-4930

28 *Attorneys for Plaintiffs Fernando Gomez Ruiz, Fernando Viera Reyes, Jose Ruiz Canizales, Yuri Alexander Roque Campos, Sokhean Keo, Gustavo Guevara Alarcon, Alejandro Mendiola Escutia and all others similarly situated*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

FERNANDO GOMEZ RUIZ; FERNANDO
 VIERA REYES; JOSE RUIZ CANIZALES;
 YURI ALEXANDER ROQUE CAMPOS;
 SOKHEAN KEO; GUSTAVO GUEVARA
 ALARCON; and ALEJANDRO MENDIOLA
 ESCUTIA, on behalf of themselves and all
 others similarly situated,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
 ENFORCEMENT; TODD M. LYONS,
 Acting Director, U.S. Immigration and
 Customs Enforcement; SERGIO

PRISON LAW OFFICE
 MARGOT MENDELSON - # 268583
 mmendelson@prisonlaw.com
 TESS BORDEN - MJP # 805022, *pro hac vice*
 tess@prisonlaw.com
 PATRICK BOOTH - # 328783
 patrick@prisonlaw.com
 ALISON HARDY - # 135966
 ahardy@prisonlaw.com
 RANA ANABTAWI - # 267073
 rana@prisonlaw.com
 1917 Fifth Street
 Berkeley, California 94710-1916
 Tel.: (510) 280-2621

CALIFORNIA COLLABORATIVE FOR
 IMMIGRANT JUSTICE
 PRIYA ARVIND PATEL - # 295602
 priya@ccijjustice.org
 MARIEL VILLARREAL - # 317048
 mariel@ccijjustice.org
 1999 Harrison Street #1800
 Oakland, California 94612
 Tel: (650) 762-8990

Case No. 3:25-cv-09757-MMC

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER RESOLVING
 MOTION FOR TEMPORARY
 RESTRAINING ORDER (ECF NO. 27)
 AND MODIFYING BRIEFING
 SCHEDULE AND EXCEEDING PAGE
 LIMITS ON DEFENDANTS'
 OPPOSITION TO PLAINTIFFS'
 MOTION FOR PRELIMINARY
 INJUNCTION AND PLAINTIFFS'
 REPLY; CONTINUING HEARING**

Judge: Hon. Maxine M. Chesney

STIPULATION AND [PROPOSED] ORDER

Case No. 3:25-cv-09757-MMC

Error! Unknown document property name.

ALBARRAN, Acting Director of San
Francisco Field Office, Enforcement and
Removal Operations, U.S. Immigration and
Customs Enforcement; U.S. DEPARTMENT
OF HOMELAND SECURITY; KRISTI
NOEM, Secretary, U.S. Department of
Homeland Security,

Defendants.

Date Filed: November 12, 2025

**JOINT STIPULATION TO RESOLVE MOTION FOR TEMPORARY RESTRAINING
ORDER AND MODIFY BRIEFING SCHEDULE AND EXCEED PAGE LIMITS**

Pursuant to Civil Local Rules 6-2, 7-11, and 7-12, the parties in the above-captioned action hereby stipulate and agree as follows:

**STIPULATION TO RESOLVE MOTION FOR TEMPORARY RESTRAINING
ORDER**

1. On December 16, 2025, Plaintiffs filed a Motion for Temporary Restraining Order (ECF No. 27);
2. On December 17, 2025, the Court held a scheduling conference regarding Plaintiffs' Motion for Temporary Restraining Order and ordered that either the parties file a joint proposed disposition or Defendants file an opposition to Plaintiffs' Motion for Temporary Restraining Order no later than 4:00 p.m. on December 22, 2025 (ECF No. 30);
3. On December 19, 2025, Defendants communicated to Plaintiffs' counsel that they had scheduled appointments with a cardiologist and urologist for Plaintiffs Yuri Alexander Roque Campos and Fernando Viera Reyes, respectively, to occur within approximately the next one and three weeks and have communicated the exact dates, as Attorneys-Eyes-Only information, to Plaintiffs' counsel;
4. The parties met and conferred and agreed to the following:
 - a. Defendants will ensure that Yuri Alexander Roque Campos receives a comprehensive assessment by a cardiologist on the agreed-upon date (barring scheduling issues outside of Defendants' control) in order for the cardiologist to develop a comprehensive treatment plan. In the event that the assessment is rescheduled, Defendants will file a declaration within twenty-four (24) hours explaining the length of the delay, the reason for the rescheduling, and why it was outside of Defendants' control;
 - b. Defendants will ensure timely compliance with all follow-up orders for treatment and medication directed by the cardiologist;

- c. Defendants will ensure that Fernando Viera Reyes receives a comprehensive assessment by a urologist on the agreed-upon date (barring scheduling issues outside of Defendants' control) in order for the urologist to perform a biopsy, if the urologist determines it to be necessary, and to develop a comprehensive treatment plan. In the event that the assessment is rescheduled, Defendants will file a declaration within twenty-four (24) hours explaining the length of the delay, the reason for the rescheduling, and why it was outside of Defendants' control;
- d. Defendants will ensure timely compliance with all follow-up orders for treatment and medication directed by the urologist, including, if indicated, timely access to an appropriate oncologist and timely compliance with any follow-up orders directed by the oncologist.

5. In light of the agreement set forth in paragraph 4 and the Court's Order approving the stipulation set forth herein, Plaintiffs hereby consider their Motion for Temporary Restraining Order (ECF No. 27) resolved and withdraw it, and the parties respectfully request that the Court vacate the hearing on the Motion for Temporary Restraining Order currently scheduled for December 23, 2025 at 10:00 a.m. (ECF No. 30);

STIPULATION ON BRIEFING SCHEDULE AND PAGE LIMITS

6. On December 1, 2025, Plaintiffs filed a Motion for Preliminary Injunction (ECF No. 22).
7. On December 15, 2025, the Court entered a stipulation (ECF No. 26) which:
 - a. continued Defendants' deadline to file their opposition to the Motion for Preliminary Injunction until January 2, 2026;
 - b. continued Plaintiffs' deadline to file their reply brief in support of the Motion for Preliminary Injunction until January 14, 2026; and
 - c. continued the parties' hearing on the Motion for Preliminary Injunction until January 30, 2026.
8. Due to the continued hearing date and in order to give the parties time to fully brief the

issues presented in this case, the parties have agreed to the following:

- a. Plaintiffs' deadline to file their reply brief in support of the Motion for Preliminary Injunction will be continued from January 14, 2026 until **January 16, 2026**;
- b. Defendants will file an opposition to the Motion for Preliminary Injunction not to exceed 30 pages in length; and
- c. Plaintiffs will file a reply brief not to exceed 20 pages in length.

IT IS SO STIPULATED.

Dated:

/s/ Cody S. Harris

KEKER, VAN NEST & PETERS LLP
STEVEN P. RAGLAND
CODY S. HARRIS
CARLOS C. MARTINEZ

PRISON LAW OFFICE
TESS BORDEN
MARGOT MENDELSON
PATRICK BOOTH
ALISON HARDY
RANA ANABTAWI

CALIFORNIA COLLABORATIVE FOR
IMMIGRANT JUSTICE
PRIYA ARVIND PATEL
MARIEL VILLARREAL

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
KYLE VIRGIEN
FELIPE HERNANDEZ
MARISOL DOMINGUEZ-RUIZ
CARMEN IGUINA GONZALEZ

Attorneys for Plaintiffs

Dated:

/s/ Savith Iyengar

SAVITH IYENGAR
Assistant United States Attorney

Attorneys for Defendants

CIVIL LOCAL RULE 5.1 ATTESTATION

Pursuant to Local Rule 5–1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories to this stipulation.

Dated: December 22, 2025

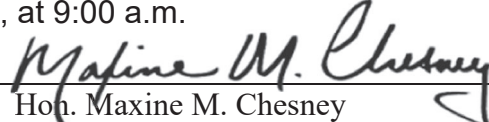
/s/ Savith Iyengar

SAVITH IYENGAR

**~~PROPOSED~~ ORDER RE: STIPULATION TO RESOLVE MOTION FOR
TEMPORARY RESTRAINING ORDER AND TO MODIFY BRIEFING SCHEDULE
AND PAGE LIMITS**

PURSUANT TO STIPULATION, IT IS SO ORDERED, with the exception that, given the requested date and page extensions, the hearing on the Motion for Preliminary Injunction is continued to February 6, 2026, at 9:00 a.m.

Dated: December 22, 2025


Hon. Maxine M. Chesney
United States District Court