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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

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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

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,

Date Filed: November 12, 2025

Defendants.

**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

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CODY S. HARRIS  
CARLOS C. MARTINEZ

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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

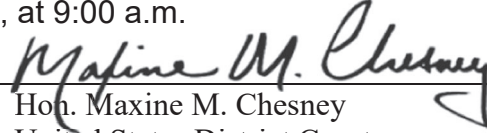
/s/ Savith Iyengar

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