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7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 ) No. 2:15-cv-785 KJN (HC)  
12 )  
SONGKRA KROEUNG, )  
13 ) **Stipulation and Proposed Order**  
Petitioner, )  
14 )  
v. )  
15 )  
JEH CHARLES JOHNSON, *et al.*, )  
16 )  
Respondents. )  
\_\_\_\_\_ )

17  
18 The parties previously stipulated to file a status report in this case on September 2, 2015, indicating  
19 any update and, if appropriate, a briefing schedule. Now attached is a declaration from Officer Julius  
20 Clinton confirming that Petitioner Songra Kroeng remains on the approved travel document list, but  
21 indicating that due to unforeseen delay, the travel document itself has not yet been signed by the  
22 Cambodian official authorized to sign. The signature is expected to happen within one week. Attachment  
23 A at ¶ 7. Once the travel document is signed, it is still estimated that travel will occur within one to two  
24 months. Attachment A at ¶ 7.

25  
26 Accordingly, the parties stipulate to file a further status report on September 17, 2015. If a travel  
27 document has not been signed by September 17, 2015, Mr. Kroeung intends to file a motion that day for  
28 release from custody and calendar it for October 15, 2015, at 10 a.m. If a travel document is signed by

1 September 17, 2015, the parties will file a status report that day stating that the travel document has been  
2 signed and setting a future date by which time the parties will either file a new status report or Mr.  
3 Kroeung will file a motion for release from custody if a firm travel date has not been arranged.  
4

5 Dated: September 2, 2015

6 Respectfully submitted,

7 BENJAMIN B. WAGNER  
8 United States Attorney

9 /s/ Audrey B. Hemesath  
10 AUDREY B. HEMESATH  
11 Assistant United States Attorney

12 HEATHER WILLIAMS  
13 Federal Defender

14 /s/ Carolyn Wiggin  
15 CAROLYN WIGGIN  
16 Assistant Federal Defender

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19 ~~PROPOSED~~ ORDER

20 Pursuant to the joint stipulation, and for the reasons set forth therein, IT IS HEREBY  
21 ORDERED that:

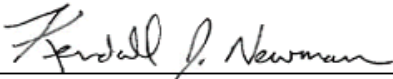
22  
23 1. The parties are directed to file a further status report on September 17, 2015 indicating  
24 whether a travel document has been signed. If a travel document has been signed, the status report  
25 shall specify a future date by which the parties will either file a new status report or Mr. Kroeung will  
26 file a motion for release from custody if a firm travel date has not been arranged

27  
28 2. If a travel document has not been signed by September 17, 2015, Mr. Kroeung is granted  
leave to file a motion that day for release from custody, to be heard by the undersigned on October 15,

1 2015 at 10 a.m. If Mr. Kroeung files a motion for release for custody, respondents are directed to file  
2 either an opposition or statement of non-opposition to the motion no later than October 1, 2015.

3 Mr. Kroeung's reply, if any, is due no later than October 8, 2015.

4 Dated: September 8, 2015

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KENDALL J. NEWMAN  
7 UNITED STATES MAGISTRATE JUDGE

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