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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13	JUAN ALBERTO ZIRANDO TINOCO,)	CASE NO. 15-CV-2801-WHA
14	Petitioner,)	
15	v.)	STIPULATION AND PROPOSED ORDER
16)	REGARDING BRIEFING SCHEDULE AND
17	JEH CHARLES JOHNSON, Secretary,)	HEARING DATE
18	Department of Homeland Security, et al.,)	
19	Defendants.)	[PURSUANT TO CIVIL LOCAL RULE 7-12]

20 Petitioner Juan Alberto Ziranda Tinoco (“Petitioner”) and respondents Jeh Charles Johnson,
21 Timothy Aiken, Leon Rodriguez, and Loretta Lynch (“Respondents”), by and through their respective
22 counsel, hereby stipulate as follows:

23 1. On June 20, 2015, Petitioner filed a Petition For A Writ of Habeas Corpus asserting that
24 his due process rights will be violated if he is removed prior to determination of his application for
25 Deferred Action for Childhood Arrivals by the United States Citizenship and Immigration Services and
26 requested that the Court order directing Respondents to stay execution of the final order of removal
27 pending the decision on the his application. [Dkt. No. 1].
28

STIPULATION REGARDING BRIEFING SCHEDULE AND HEARING DATE
15-CV-2801-WHA

1 2. On June 23, 2015, Petitioner re-filed a Motion to Stay Execution of Removal Order and
2 requested a Court order directing Respondent to stay execution of the Final Order of Removal. [Dkt. No.
3 6.]. A hearing on Motion was set for June 23, 2015 at 2:30p.m.

4 3. On June 23, 2015, Counsel for the Government contacted Petitioner's counsel and
5 informed him that Respondents would agree to stay removal temporarily in order to allow the parties to
6 submit briefing on the issues raised in the Motion to Stay and Petition for Writ of Habeas Corpus.
7

8 4. The parties have agreed that the Government will file their Response to Motion to Stay
9 and Return to Petitioner's Petition for A Writ of Habeas Corpus on June 30, 2015 and that Petitioner
10 will file his Reply and Traverse on July 7, 2015. The parties have further agreed that this matter should
11 be set for hearing with this Court on July 16, 2015 at 8:00a.m.

12 **THEREFORE, IT IS HEREBY STIPULATED** by and between Petitioner and Respondents
13 that Respondents will file their Return to Petitioner's Petition For A Writ of Habeas Corpus on **June 30,**
14 **2015** and Petitioner will file his Traverse on **July 7, 2015** and that this matter should be set for hearing
15 with this Court on **July 16, 2015 at 8 a.m.**

16 Dated: June 23, 2015

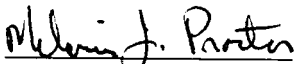
Respectfully Submitted,

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18 
19 JAMES TODD BENNETT
Attorney for Petitioner

20 Dated: June 23, 2015

Respectfully Submitted,

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22 MELINDA HAAG
United States Attorney

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24 MELANIE L. PROCTOR
25 Assistant United States Attorney
26 Attorney for Respondents
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13	JUAN ALBERTO ZIRANDO TINOCO,)	CASE NO. 15-CV-2801-WHA
14)	
15	Petitioner,)	PROPOSED ORDER APPROVING
16)	STIPULATION AND SETTING BRIEFING
17	v.)	SCHEDULE AND HEARING DATE
18)	
19	JEH CHARLES JOHNSON, Secretary,)	
20	Department of Homeland Security, et al.,)	[PURSUANT TO CIVIL LOCAL RULE 7-12]
21)	
22	Defendants.)	

20 Pursuant to the stipulation of the parties, and based on good cause, it is hereby ORDERED that
21 Respondents will file their Return to Petitioner’s Petition For A Writ of Habeas Corpus on **June 30,**
22 **2015** and Petitioner will file his Traverse on **July 7, 2015**. A hearing on this matter will be set before
23 this Court on **July 16, 2015 at 8 a.m.**

24
25 Dated: June 29, 2015.


WILLIAM H. ALSUP
United States District Judge