

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Edicson David QUINTERO CHACÓN,

Petitioner,

v.

Terrence DICKERSON, Warden, Stewart Detention
Center, et al.,

Respondents.

Civil Action No. 4:25-cv-50-CDL-AGH

JOINT STATUS UPDATE AND PROPOSED SCHEDULE

Pursuant to the Court's Order dated April 8, 2025 (ECF No. 12), the parties hereby provide this update and proposed schedule to the Court.

Since the Court's April 8 Order, Petitioner has filed an Amended Petition. (ECF No. 24). The Parties agree that any jurisdictional discovery will depend on arguments Respondents raise in a motion to dismiss the Amended Petition on jurisdictional grounds. Respondents may also move to stay these proceedings in light of proceedings in a separate case raising claims on behalf of a certified class under the Administrative Procedure Act. *See D.V.D. v. U.S. Dep't of Homeland Sec.*, --- F. Supp. 3d ---, 2025 WL 1142968 (D. Mass. Apr. 18, 2025), *appeal docketed*, No. 25-1393 (1st Cir. Apr. 22, 2025). Based on the information available at this time, Petitioner anticipates opposing that motion.

The Parties propose the following briefing schedule:

May 2, 2025	Respondents' motion to dismiss Amended Petition or stay proceedings
May 5, 2025	Petitioner's motion for jurisdictional discovery

May 9, 2025	Petitioner's opposition to motion to dismiss or stay proceedings
May 14, 2025	Respondents' reply in support of motion to dismiss or stay proceedings and opposition to jurisdictional discovery
May 16, 2025	Petitioner's reply in support of motion for jurisdictional discovery

The parties will confer regarding the scope and timeframe for discovery in advance of Petitioner's motion for jurisdictional discovery, with briefing on that motion to resolve outstanding disputes. To the extent post-discovery briefing is necessary, the Parties anticipate submitting a joint proposal to the Court addressing that briefing schedule as well as the Parties' positions regarding the need for an evidentiary hearing.

Separate from the issue of jurisdictional discovery, the Parties have reached an agreement in principle that Respondents will produce to Petitioner's counsel all non-privileged documents in Petitioner's A-file. Respondents agree to produce the Notice to Appear, the Immigration Judge's final order of removal, the warrant of removal, Post Order Custody Review (POCR) decision(s), and other miscellaneous documents from the removal proceedings within one week of this filing. Any remaining documents in the A-file, excluding privileged documents, will follow. Petitioner's counsel has also requested production of Petitioner's Record of Proceedings before the Executive Office of Immigration Review. Respondents' counsel is inquiring about the process for obtaining the Record of Proceedings. If the Parties cannot reach agreement on these matters within a reasonable timeframe, they will bring the dispute to the Court.

Dated: April 22, 2025

Respectfully submitted,

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