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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Adrian Arturo Viloria Aviles,

Petitioner,

v.

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Donald J. Trump, Pamela J. Bondi, Kristi Noem, Madison Sheahan, Marco Rubio, Jason Knight, Christopher Chestnut,

Respondents.

Case No. 2:25-cv-00611-GMN-DJA

Joint Stipulation to Stay the Proceedings (Second Request)

Petitioner Adrian Arturo Viloria Aviles and the Federal Respondents, by and through their undersigned counsel, hereby stipulate and jointly request that the Court stay all deadlines and hold this matter in abeyance, as set forth below:

The parties have conferred and agree that a stay is warranted in light of ongoing proceedings in *W.M.M. v. Trump*, Fifth Circuit Case No. 25-10534. The United States Supreme Court recently vacated and remanded that case to the Fifth Circuit for further proceedings. See *W.M.M. v. Trump*, No. 24-1177, 2025 WL 1417281, at \*1 (2025). One of the key issues now pending before the Fifth Circuit is the scope of notice required for putative class members. *Id.* at \*2, \*4.

The parties believe that the resolution of *W.M.M. v. Trump* likely will bear directly on the issues presented in this case. Accordingly, the parties respectfully request that the Court stay this matter. The stay would remain in place until the earlier of: (a) the entry of a final

1 order in Mr. Aviles's removal proceedings under the Immigration and Nationality Act 2 (INA), or (b) the final resolution of W.M.M. v. Trump by the United States Supreme Court. 3 The parties further agree that the preliminary injunction currently in effect shall 4 remain in place during the pendency of the stay. 5 This is the second request to stay proceedings in this case. The request is made in 6 good faith and not for purposes of delay or any other improper reason, but to promote a just, 7 speedy, and inexpensive resolution consistent with Federal Rule of Civil Procedure 1. 8 Respectfully submitted this 29th day of May 2025. 9 IT IS SO STIPULATED. 10 11 Dated this 29th day of May 2025 Dated this 29th day of May 2025 12 UNLV IMMIGRATION CLINIC UNITED STATES ATTORNEYS' **OFFICE** 13 By: /s/ Michael Kagan By: \_/s/ Christian R. Ruiz 14 MELISSA CORRAL Nevada Bar. No. 14182 CHRISTIAN R. RUIZ 15 MICHAEL KAGAN SUMMER JOHNSON Nevada Bar No. 12318C 16 DANIEL GALINDO Attorneys for Respondents Bar No. 292854 17 LEE GELERNT Bar No. 2502532 18 SADMIRA RAMIC Nevada Bar No.: 15984 19 CHRISTOPHER M. PETERSON Nevada Bar No. 13932 20 Attorneys for Petitioner 21 22 IT IS SO ORDERED: 23 24 25 United States District Judge 26 27 June 3, 2025 DATED: 28