

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

<hr/>)
JOHN DOE)
)
<i>Plaintiff-Petitioner,</i>)
)
v.)
)
CHRISTOPHER BRACKETT)
Superintendent of Strafford County)
Department of Corrections;)
)
PATRICIA H. HYDE)
Boston Field Office Director)
Immigration and Customs Enforcement)
)
TODD LYONS)
Acting Director)
U.S. Immigration and Customs Enforcement)
)
KRISTI NOEM)
Secretary)
U.S. Department of Homeland Security)
)
)
<i>Defendants-Respondents.</i>)
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Civ. No: 1:25-cv-00158-PB-TSM

OBJECTION TO MOTION TO EXTEND TIME TO ANSWER

Petitioner John Doe (“Petitioner”) hereby objects to the government’s motion to extend time to answer the petition. Petitioner has been detained for over twenty-one months. Every day that Petitioner remains in jail is another day where he cannot be with his daughters, one of whom is suffering from severe health issues, and support his ex-wife in the care of his children. *See*

Petition ¶¶ 6, 22. Further, the two student attorneys from Boston College Law School who have diligently worked in drafting the petition and motions will be leaving the area to start summer internships out of state in early June, and any delay would prevent them from being able to participate further in the case.

Respectfully submitted,

/s/ Ronald Abramson

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/s/ Mary Holper

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*Attorney Holper, *admitted pro hac vice* under D.N.H. Local Rule 83.2(b) on May 5, 2025.

*Reysa and Brutis, *student appearances* under D.N.H. Local Rule 83.2(c), Appearance in Court by Law Students and Graduates filed on May 8, 2025.

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be served on all registered parties.

Dated: May 13, 2025

/s/ Mary Holper

Mary Holper