

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

CESAR JANISCO MEJIA-ACOSTA
Petitioner,

vs.

PAMELA JO BONDI, Attorney General, et al.,
Respondents.

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CIVIL ACTION NO. 1:25-cv-00138

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING (UNOPPOSED)**

Respondents, by and through, Nicholas J. Ganjei, United States Attorney for the Southern District of Texas, respectfully move this Court to grant them an extension of time to file their answer to *Petitioner's Petition for Writ of Habeas Corpus* ("Petition"). In support of this motion, Respondents submit:

1. On April 21, 2025, Petitioner filed his Petition alleging that he was being illegally detained by Respondents. The Petition was originally filed in the Western District of Texas (WDTX). (ECF 1)
2. After the Petition was filed, it was determined that the WDTX did not have jurisdiction over Petitioner as he was being held in the custody of Respondents at the El Valle Detention Center located in Raymondville, Texas – within the jurisdiction of the Southern District of Texas (SDTX). (ECF 11 and 12)
3. As such, the WDTX court issued an Order transferring the case to the SDTX. (ECF 12)
4. While the case was pending in the WDTX, summons' were issued and served on Respondents. The United States Attorney's Office in the WDTX was served on May 19, 2025. *In lieu* of a responsive pleading, the USAO in the WDTX moved for a change of venue. Had the USAO not filed a motion for a change of venue, Respondents'

Answer/Responsive pleading herein would be due on July 18, 2025.

5. In addition, it is the understanding of the undersigned counsel for the government that a hearing is scheduled to take place in immigration court on July 21, 2025. It is anticipated that the outcome of this hearing will likely impact how this case would or should proceed.
6. Counsel for Respondents respectfully seek an extension of this deadline to a date to be established by the Court at the July 22, 2025, status hearing. By this point in time, it is likely that the parties will know the outcome of the immigration court hearing and they will be better able to address any remaining issues.
7. Consequently, Respondents request they not be required to file a formal response until such time as this Court deems necessary at the July 22, 2025, hearing.

PRAYER

Respondents pray that this Court grant this motion and allow Respondents sufficient time to formulate their response and establish a Response/Answer due date at the July 22, 2025, Status Hearing in this matter.

Respectfully Submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

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Read and Approved:

/s/ Jacqueline Lee Watson (w/ permission by NLM)
Jacqueline Lee Watson for Petitioner

CERTIFICATE OF CONSULTATION

On July __, 2025, the undersigned consulted with Petitioner's counsel regarding the contents of this motion. Petitioners' counsel advised that she **opposed/did not oppose** the Respondents' request for extension of time to file their answer/responsive pleading to Petitioner's Petition.

Signed: July __, 2025

/s/ Nancy L. Masso
NANCY L. MASSO
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent on July __, 2025 to counsel of record via the court enabled electronic filing system.

BY: /s/ Nancy L. Masso
NANCY L. MASSO
Assistant United States Attorney