

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
Laredo Division**

ISRAEL ADONAY SAGASTIZADO SANCHEZ,)

Petitioner,)

v.)

KRISTI NOEM, *et al.*,)

Respondents.)
_____)

Civil Action No. 5:25-cv-104

**Consent Motion to Suspend Briefing Deadline
Pending Adjudication of
Petitioner's Motion for Leave to Serve Document Request**

Petitioner Israel Adonay Sagastizado Sanchez, by counsel, with the consent of Respondents, by counsel, hereby moves this Court to suspend his briefing deadline pending the adjudication of his Motion for Leave to Serve Document Request. In support hereof, Petitioner respectfully represents as follows:

1. Petitioner filed his petition for writ of habeas corpus on June 5, 2025. Dkt. No. 1. On June 26, 2025, this Court ordered Respondents to respond to the petition. Dkt. No. 3. Respondents requested and were granted a brief extension, Dkt. Nos. 5, 6; and on August 8, 2025, Respondents filed their Motion to Dismiss, Dkt. No. 7, along with seven exhibits thereto, Dkt. Nos. 7-1 through 7-8.

2. On August 16, 2025, Petitioner filed a Motion for Leave to Serve Document Request, arguing that he needs discovery on communications between Respondents and the government of Mexico, in order to properly respond to Respondents' Motion to Dismiss. Dkt. No. 8.

3. While the Motion for Leave to Serve Document Request is pending adjudication, the parties agree that Petitioner's briefing deadline to oppose Respondents' Motion to Dismiss (Dkt. No. 7) should be suspended.

WHEREFORE, Petitioner, by counsel, with the consent of Respondents, by counsel, respectfully request that this Court suspend Petitioner's briefing deadline to oppose Respondents' Motion to Dismiss (Dkt. No. 7) be suspended, pending the adjudication of the pending discovery motion (Dkt. No. 8).

Respectfully submitted,

/s/ Simon Y. Sandoval-Moshenberg
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Date: August 16, 2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF case management system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

Respectfully submitted,

/s/ Simon Y. Sandoval-Moshenberg
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Date: August 16, 2025