

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT OWENSBORO

YULIETH GOMEZ MEJIA

PETITIONER

v.

NO. 4:25-CV-82-GNS

KRISTI NOEM, in her Official Capacity as
Secretary, Department of Homeland Security;
TODD LYONS, in his Official Capacity as
Acting Director, U.S. Immigration and
Customs Enforcement;
PAM BONDI, in her Official Capacity as
Attorney General of the United States; and
JASON WOOSLEY, in his Official Capacity as
Grayson County Jailer

RESPONDENTS

MOTION TO ACCEPT PETITIONER'S BRIEF AS TIMELY FILED

Comes the Petitioner, Yulieth Gomez Mejia, and moves this court to accept her brief as timely filed. In support of this motion, the Petitioner avers the following:

On August 13, 2025, this matter came before this Court. The Court heard arguments on the record and issued a scheduling order for both parties to timely file briefs. Petitioner's counsel was determined to complete this brief and submitted it within the week due to her client's continued detention. Petitioner's counsel requested five days to submit the brief. Counsel submitted the brief on the 6th day at 2:30 am. The Petitioner moves this court to accept this brief as timely filed due.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

A true and accurate copy of this Brief and all of the exhibits were served upon opposing counsel through electronic filing on August 19, 2025.



Rania A. Attum