

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY AT LOUISVILLE

YULIETH GOMEZ MEJIA

PETITIONER

v.

NO. 4:25-CV-82-RGJ

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

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**PETITIONER'S OPPOSITION TO RESPONDENTS' MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PETITIONER'S POST-HEARING BRIEF**

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The Petitioner, Yulieth Gomez Mejia, by and through counsel, hereby objects to Respondents' motion for an extension of time to file their response to Petitioner's post-hearing brief.

1. This Court held an evidentiary hearing on September 24, 2025. All parties were present.
2. The Court then directed Petitioner to file a post-hearing brief on or before September 29, 2025. Petitioner timely filed a post-hearing brief on September 29, 2025.
3. This Court also ordered that the Respondents' reply brief is due on or before October 3, 2025. At 6:18 PM, Respondent emailed Petitioner's counsel seeking a request for an

unopposed motion to the extension. Because counsel had no way to get authority from her client, counsel could not agree to an unopposed motion.

4. While Counsel understands Respondents' position and potential unforeseen difficulties with the current lapse in appropriations, respectfully, Respondents have had since August 28, 2025, to verify the facts relating to the August 22<sup>nd</sup> NTA. On August 28, 2025, Respondents filed the August 22 NTA to this Court and made representations it had been personally served on Petitioner. Petitioner then challenged that at the September 24, 2025, evidentiary hearing.
5. At the evidentiary hearing, Respondents stated: "And they were served on August 22<sup>nd</sup>. Whether it was served on September 10<sup>th</sup>, it was served, and now she's moving into that." DN 27-1, at 42:17-19.
6. Respondents' have long been aware of the disputed fact of when Petitioner was served an NTA. To wait until the night Respondents' brief is due to ask for an extension is improper. Respondents provided no supporting evidence to this Court that they have in good faith tried to get whatever it is Respondents deem is necessary to add to their brief prior to the day this Court ordered the brief to be due.
7. Wherefore, Petitioner objects to the Respondents' request for an extension to file their post-hearing brief and respectfully requests this Court DENY such motion.

Respectfully Submitted,

*Adriana L. Harris*

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**CERTIFICATE OF SERVICE**

A true and accurate copy of this pleading and all attached documents were served upon opposing counsel via electronic filing, CM/ECF on October 6, 2025.

*Adriana L. Harris*  
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Adriana Harris