



**DAVIS, NDANUSA, IKHLAS & SALEEM, LLP**

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October 7, 2025

**VIA ECF**

Honorable Jamel K. Semper  
United States District Judge  
Martin Luther King Jr. United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**RE: *Khan v. U.S. Department of Homeland Security, et al.*, (2:25-cv-14246-JKS)**  
Second Letter Request for Extension of Deadline

Dear Judge Semper:

Our office represents Imran Khan (“Petitioner”) in the above-captioned matter. We respectfully request a second extension from October 8, 2025 to October 22, 2025 of the deadline set forth by this Court to respond to the Respondents’ Answer (“Answer”) filed on September 26, 2025.

In our previous letter filed on September 29, 2025, we requested an extension based upon needing additional time to gather information from the Petitioner’s immigration attorney, Elihu Saul Massel, Esq. (“Mr. Massel”) , regarding the status of the motion to reopen filed with Executive Office for Immigration Review on July 23, 2025. To date, we have not yet received a response (*see* attempts to correspond with Mr. Massel attached hereto as **EXHIBIT “A”**) , and as a result, require additional time to attempt to gather that which is necessary in support of our response.

We thank the Court for its consideration of this request.

Respectfully submitted,

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Mohammad Akif Saleem, Esq.  
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*Counsel for Petitioner*

cc: Counsel of Record (via ECF)

# **EXHIBIT A**



Yasin Hassan <yhassan@dnislaw.com>

**Request for Update on Imran Khan case (A# [REDACTED])**

2 messages

**Yasin Hassan** <yhassan@dnislaw.com> Mon, Sep 29, 2025 at 10:02 AM  
To: Elihu Massel <elihu.massel@gmail.com>  
Cc: "Mohammad A. Saleem" <msaleem@dnislaw.com>

Good morning Mr. Massel,

We spoke previously on Imran Habib Khan's immigration case. Our office is counsel of record for his Habeas Petition.

We're working on our response to the government's answer to our Petition. Do you have any updates on the immigration court side regarding the motion to reopen? Would you also be open to sharing any recent filings in connection to the motion you've filed that may aid our argument regarding Mr. Khan's release. Please advise.

-Yasin

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Yasin Hassan  
Paralegal & Systems Manager  
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**Yasin Hassan** <yhassan@dnislaw.com> Wed, Oct 1, 2025 at 10:00 AM  
To: Elihu Massel <elihu.massel@gmail.com>  
Cc: "Mohammad A. Saleem" <msaleem@dnislaw.com>

Good morning Mr. Massel,

I wanted to follow up regarding the above at your earliest convenience.

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**Yasin Hassan**

Paralegal & Systems Manager

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