

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-23665-JB

PEDRO BELLO-RUBIO, *et al.*,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as the
United States Secretary of the Department
Homeland Security (DHS), *et al.*,

Defendants.

**PLAINTIFFS' PARTIAL OPPOSITION TO
DEFENDANTS' MOTION FOR AN EXTENSION OF TIME OF SIXTY DAYS
TO RESPOND TO THE MOTION FOR CLASS CERTIFICATION**

The plaintiffs, by and through the undersigned, partially oppose the defendant's motion for an extension (D.E. 33). As noted in the defendants' certificate of conferral (*id.*), the plaintiffs are not opposed to a thirty-day extension for the defendants' response to the pending motion for class certification (D.E. 24), and they understand that this case involves an unusually high number of plaintiffs. However, the plaintiffs believe that a sixty-day extension is too long, and request that the Court allow only a thirty-day extension, seeing as the motion for class certification is not a case dispositive motion requiring review of an administrative record, or an evidentiary record to show "the true cause of the detention" under 28 U. S. C. § 2243.

Respectfully submitted,

Dated: October 28, 2025

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