

Harold Herrera-Ramirez  
Alien No. [REDACTED]  
Nevada Southern Detention Center  
2190 East Mesquite Avenue  
Pahrump, Nevada 89060

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COUNSEL/PARTY	
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NOV 03 2025	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

*MAN*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HAROLD HERRERA-RAMIREZ, )  
 -Petitioner, *Pro Se*, )  
 v. )  
 THE UNITED STATES OF AMERICA, *et. al.*, )  
 Michael BERNACKE, in his Official Capacity, )  
 Field Office Director, Salt Lake City Field Office, )  
 U.S. Immigration and Customs Enforcement, )  
 Patrick J. LECHLEITNER, in his Official Capacity, )  
 Acting Director, Immigration & Customs Enforcement, )  
 Kerri Ann QUIHUIS, in her Official Capacity, )  
 ICE Field Office Director, Detention and Removal, )  
 Las Vegas, Nevada (ICE Local) )  
 Kristi NOEM, in her Official Capacity, )  
 Secretary of the Department of Homeland Security )  
 Pamela J. BONDI, in her Official Capacity, )  
 Attorney General, Department of Justice, )  
 John MATTOS, in his Official Capacity, )  
 Warden of Immigration Detention Facility, )  
 Nevada Southern Detention Center; )  
 -Respondents. )

Case No. )  
 INS No. A [REDACTED] )  
**Case No. 2:25-cv-01749-MMD-EJY**

Custody Status: **DETAINED**

**MOTION TO ACCEPT LATE FILING**

**MOTION TO ACCEPT LATE FILING**

Comes now Mr. Harold Herrera-Ramirez, as the Petitioner, appearing *Pro Se* in this present matter, and respectfully submits this instant motion to accept late filing of Petitioner's "Reply". This present motion to accept late filing is being submitted in the event that this Court deems the filing of my "Reply" to be late. Here, Because Petitioner is *Pro Se* and lacks English proficiency, Petitioner respectfully request for this Court to accept the late filing of the "Reply".

Petitioner points out that this Court ordered the Respondents to file and serve their response (“Response”) to the petition up until and including October 10, 2025. In turn, Petitioner was to have 15 days from the date of service of the Respondents to file and serve his reply (“Reply”).

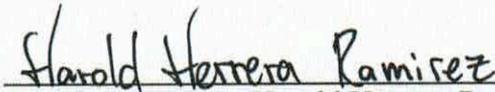
This is a case where Petitioner does not have the benefit of the assistance of counsel and his liberty is at stake. Therefore, the risk of error is heavily great because the Respondents are represented by trained and qualified attorneys while Petitioner has no legal representation. *See Santosky v. Kramer*, 455 U.S. 745, 763 (1982) (requiring clear and convincing evidence at parental termination proceedings because “numerous factors combine to magnify the risk of erroneous factfinding” including that “parents subject to termination proceedings are often poor, uneducated, or members of minority groups” and “[t]he State's attorney usually will be an expert on the issues contested”).

Petitioner is physically detained and is compelled to rely on the facilities legal mail system and should not have to suffer the harsh punishment or consequences of non-delivery by not receiving proper timely notice. Petitioner's intentions is to pursue his petition for writ of habeas corpus to a full resolution. Petitioner was prepared to file his “Reply” if proper timely notice or a copy of Respondents “Response” was given. Thus, this Court should grant this motion and consider the late-filed “Reply”.

**WHEREFORE, PREMISES CONSIDERED,** Petitioner, Harold Herrera-Ramirez, respectfully prays to this Court to grant this instant Motion to Accept Late Filing of the “Reply” and to grant the late-filed “Reply” and any further relief this Court deems just and proper.

**Dated** this 27th day of October, 2025.

Executed in Pahrump, Nevada.

  
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Alien No.   
Nevada Southern Detention Center  
2190 East Mesquite Avenue  
Pahrump, NV 89060

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**ACKNOWLEDGEMENT AND VERIFICATION**

Under penalty of perjury, the undersigned declares that he is the named Petitioner in the foregoing petition. I have read the foregoing motion and its contents. The statements in the motion are true and correct to the best of my knowledge, except as to any statements alleged on information and belief, and as to those statements, I believe them to be true.

**DATED** this 27th day of October, 2025.

**EXECUTED** in Pahrump, Nevada.

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