

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

LAZARO EZEQUIEL AJCAC CULAY,

Petitioner,

v.

Case No. 1:25-cv-00900-JLS

JOHN DOE, Facility Director, Buffalo
Federal Detention Facility; TODD LYONS,
Acting Director, U.S. Immigration and
Customs Enforcement; KRISTI NOEM, U.S.
Secretary of Homeland Security; PAMELA
BONDI, U.S. Attorney General; JANE DOE,
Director of Executive Office for Immigration
Review,

Respondents.

**PETITIONER'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
RESPONDENTS' MOTION TO DISMISS,
ASSENTED-TO BY RESPONDENTS**

Petitioner Lazaro Ezequiel Ajcac Culay respectfully requests the Court extend the time for filing his response to Respondents' Motion to Dismiss ("MTD") from December 1, 2025, to **December 5, 2025**. As reasons therefor Petitioner states that he has proceedings scheduled in U.S. Immigration Court ("IC") this week that could bear on issues in the instant habeas case. The additional time will allow counsel in this case to incorporate any relevant developments in the IC into the MTD response Petitioner files in this case.

Respondents assent to this request.

Respectfully submitted,

/s/ Benjamin B. Tymann

Benjamin B. Tymann, Mass. BBO #652011

Admitted Pro Hac Vice

Tymann, Davis & Duffy, LLP

45 Bromfield Street, 6th Floor

Boston, MA 02108

Tel. 617.933.9490

btymann@tddlegal.com

Paul O'Dwyer

Law Office of Paul O'Dwyer, P.C.

134 West 26 Street, Suite 902

New York NY 10001

(646) 230-7444

paul.odwyer@paulodwyerlaw.com

Assented to:

/s/ Adam A. Khalil

Adam A. Khalil

DOJ-USAO

100 State Street, Suite 500

Rochester, NY 14614

585-399-3979

Email: adam.khalil@usdoj.gov

December 1, 2025