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October 10, 2025

**By ECF**

Hon. Michael E. Farbiarz, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Frank R. Lautenberg U.S. Post Office and Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *Macancela Buestan v. Chu et al.*, No. 25-16034  
Unopposed request for three-day extension of order to answer**

Dear Judge Farbiarz:

This Office represents the Respondents in this § 2241 habeas matter. We write to respectfully request an extension of three days (72 hours) from the Court's Order to Answer deadline. If the Court grants the request, the updated answer deadline will be Thursday, October 16, 2025, at 11:59 p.m.

Respondents respectfully submit that there is good cause for this request. The Order to Answer issued today, October 10, 2025, and the current response deadline is a federal holiday. This Office and ICE need time to collect the pertinent records and prepare an answer to the points and authorities in Petitioner's 30-page petition. ECF No. 1. That task is complicated by the fact that, on September 30, 2025, ICE transferred Petitioner from Delaney Hall in New Jersey to Adams County Correctional Center in Natchez, Mississippi. We may need to confer with staff at that facility if there are physical records that traveled with Petitioner.

Thus, we respectfully request an additional three days (72 hours) to prepare and file an answer. I communicated with Petitioner's counsel who does not object to the Respondent's request for a three-day extension.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

TODD BLANCHE  
U.S. Deputy Attorney General

ALINA HABBA  
Acting United States Attorney  
Special Attorney

By: /s/ John T. Stinson  
JOHN T. STINSON  
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cc: Counsel of Record