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November 7, 2025

The Honorable Jamel K. Semper
United States District Judge
United States District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **Letter/Motion for Extension to File Reply**
Jimenez-Pineda, Ubaldo v. Soto et al (Delaney Hall Detention Facility)
Case No. 2:25-cv-16180-JKS

Dear Judge Semper:

I write as counsel to the Petitioner, Ubaldo Jimenez-Pineda in the above-captioned matter.

This letter is written to request an extension of time to file a reply to the government's response filed on October 23, 2025, in a habeas corpus proceeding, for seven days, to Friday, 14, 2025.

The reason for the extension is due to the complexity of issues and similar cases pending in this and other districts. No previous requests for an extension of time have been made. This request does not impact any other scheduled deadlines.

I advised the government of this request and they do not have an objection.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ Martin W. Chow, Esq.
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