

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MARCIO ANDRES RUIZ PEREZ

Petitioner,

v.

LUIS SOTO, *et al.*

Respondents.

Case No. 25 Civ. 16871 (JXN)

**NOTICE OF  
CONSENT  
MOTION TO  
AMEND  
BRIEFING  
SCHEDULE  
AND EXTEND  
PAGE LIMITS**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that today, December 17, 2025, the undersigned attorney for Petitioner Marcio Andres Ruiz Perez, Leena Khandwala, moves this Court for an Order amending the briefing schedule in this matter and extending page limits.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith pursuant to Local Civil Rule 7.1(e).

Respectfully submitted,

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Petitioner Marcio Andres Ruiz Perez moves the Court to amend the briefing schedule in this matter and to extend page limits.

On December 17, 2025, Petitioner retained undersigned counsel to represent him in his petition for a writ of habeas corpus, which is currently pending before this Court.

The same day, Counsel for Petitioner conferred with Assistant United States Attorney Alex Silagi, Counsel for Respondents, who stated that he does not object to the requests contained in this Motion.

The Court previously set a deadline of December 24, 2025 for Petitioner's Reply. *See* ECF 8, Order. In addition to the Reply, Petitioner intends to file a Second Amended Petition on or before that date, with the consent of Respondents, pursuant to Fed. R. Civ. P. 15(a)(2). *See Mayle v. Felix*, 545 U.S. 644, 655 (2005)

(noting that Rule 15 is made applicable to habeas proceedings by 28 U.S.C. § 2242, Fed. R. Civ. P. 819a)(2), and Habeas Corpus R. 11). Civ. Local R. 7.2(d)).

In the interests of justice and the efficient disposition of this matter, Petitioner respectfully requests that, in lieu of a further response to the Second Amended Petition, the Court permit Respondents to file a surreply no later than January 5, 2026. Respondents do not object to this proposal, which will permit Respondents an opportunity to respond to any outstanding issues.

Petitioner further respectfully requests that, to enable a full exposition of the issues in this matter, the Court extend the page limits for both briefs to 15 pages in 12-point font. *Cf.* Civ. Local R. 7.2(d).

Dated: December 17, 2025

Respectfully submitted,

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