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UNITED STATES DISTRICT COURT
FEDERAL DISTRICT COURT OF NEVADA

SERRANO GONZALEZ, Jose Fransisco

Petitioner,

v.

Jason KNIGHT, Field Office Director of Enforcement and Removal Operations, Salt Lake City Field Office, Immigration and Customs Enforcement; Michael BERNACKE, Acting Director of the Las Vegas U.S. Immigration and Customs Enforcement Field Sub-Office; Kristi NOEM, Secretary, U.S. Department of Homeland Security; Pamela BONDI, U.S. Attorney General; John MATTOS, Warden, Nevada Southern Detention Center,

Respondents.

Case No. 2:25-cv-02081

**OPPOSITION TO MOTION TO
ENLARGE TIME FOR FILING
DEADLINES (Dkt. 17)**

Petitioner respectfully asks this Court to deny Respondents' Emergency

Motion for Extension of Time to File a Response to Order to Show Cause (Dkt. 17).

First, Respondents have failed to comply with LR II 7-4(a)(3), which requires the parties to attempt to meet and confer prior to the Court granting an emergency motion of any kind. The rule specifically requires that:

A statement of movant certifying that, after participation in the meet-and-confer process to resolve the dispute, the movant has been unable to resolve the matter without court action. The statement also must state when and how the other affected people or entities were notified of the motion or, if not notified, why it was not practicable to do so. If the nature of the emergency precludes a meet and confer, the statement must include a detailed description of the emergency, so the court can evaluate whether a meet and confer truly was precluded.

No meet and confer occurred in this matter. Counsel for Petitioner first learned of the request for additional time when the motion was filed. The motion does not state that a meet and confer was precluded by the nature of the emergency, and counsel for Respondents had adequate time to contact Petitioner's counsel to confer about the request. Therefore, Respondents' motion should be denied for failure to comply with this Court's local rules.

Second, good cause exists neither for the extension of time, nor for the failure to meet and confer about the request. "Good cause comes into play in situations in which there is no fault—excusable or otherwise. In such situations, the need for an extension is usually occasioned by something that is not within the control of the movant" and "requires the moving party to show the deadline cannot be met despite the movant's diligent efforts." *Utah*

CERTIFICATE OF SERVICE

I, Casey Parsons, hereby certify that I served a copy of the foregoing document onto the attorneys for the interested parties at the following location:

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Dated: November 4, 2025

By: /s/ Casey Parsons
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