

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
SAN ANGELO DIVISION

ANTONIO DE JESUS GALLEGOS  
HERNANDEZ,

Petitioner,

v.

KRISTI NOEM,  
Secretary of Homeland Security, et al.,

Respondents.

Civil No. 6:25-cv-00087-H

**PETITIONER'S UNOPPOSED MOTION TO EXTEND TIME TO FILE  
REPLY TO RESPONDENTS' RESPONSE BRIEF**

TO THE HONORABLE JUDGE HENDRIX:

COMES NOW, Petitioner, by and through his undersigned Counsel, John M. Bray, and respectfully move the Court, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, to extend Petitioner's time to file a reply to Respondents' response in opposition to the petition for writ of habeas corpus, as imposed by the Court's scheduling order (Doc. No. 2), for at least one day, from December 9, 2025, until December 10, 2025, for good cause shown.

The undersigned Counsel for Petitioner has endeavored to draft a cogent reply to Respondents' brief in response to the relief request in the petition for writ of habeas corpus. However, over the last several days, the undersigned Counsel for Petition has been unable to do so due to unforeseen time commitments in other matters pending in state and federal courts.

Specifically, these time commitments have included two depositions in a contested probate matter in Tarrant County, Texas on Monday, December 8, 2025, as well as an in-person hearing

on a different habeas matter in the San Antonio Division of the Western District of Texas which was set for just today, December 9, 2025, at 1:30 p.m. *See* Ex. A, Notice of Deposition; *see* Ex. B, Notice of Habeas Hearing. Moreover, in the days prior to this, the undersigned Counsel experienced flu-like symptoms, including dizziness, cold chills, aches, and a persistent cough, for which the undersigned obtained prescription antibiotics.

In light of the foregoing, the undersigned Counsel for Petitioner would assert good cause exists to extend Petitioner's time to file a reply to Respondents' response brief.

Petitioner's request to extend time is for good cause and is not intended for delay. Respondents will not be prejudiced by a brief extension of one calendar day, as the undersigned Counsel for Petitioner has conferred via email with Mr. Brian Stoltz, Counsel for Respondents, who stated that he does not oppose an extension of one day.

#### **CONCLUSION & PRAYER**

Wherefore, premises considered, Petitioner asks the Court to extend Petitioner's deadline to file a response to no earlier than December 10, 2025.

Respectfully submitted,

THE LAW OFFICE OF JOHN M. BRAY, PLLC

/s/ John M. Bray

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*Attorney for Petitioner*

**CERTIFICATE OF CONFERENCE**

I certify that I conferred via email today, December 9, 2025, with Mr. Brian Stoltz, Counsel for Respondents, concerning the relief requested in the above and foregoing *Motion for Extension*, and I was informed that the Respondents do not oppose this motion.

/s/ John M. Bray  
John M. Bray  
Attorney for Petitioners

**CERTIFICATE OF SERVICE**

By my signature below, I hereby certify that on this 9th day of December, 2025, a true and correct copy of the above and foregoing **PETITIONER'S UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY TO RESPONDENTS' RESPONSE BRIEF**, as well as any and all attachments thereto, was served on all parties of record by electronically filing the same with the Court using the Court's CM/ECF system, including on the following parties.

/s/ John M. Bray  
John M. Bray  
Attorney for Petitioner

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**ORDER GRANTING EXTENSION OF TIME TO FILE  
REPLY TO RESPONDENTS' RESPONSE BRIEF**

After considering Petitioner's unopposed motion to extend the time to file a reply to Respondents' brief in response to Petitioner's petition for writ of habeas corpus, the Court hereby finds that there is good cause to extend Petitioner's time to file a reply brief.

Therefore, the Court **GRANTS** Petitioner's unopposed motion. Accordingly, Petitioner's deadline to file a reply brief is now December 10, 2025.

SIGNED on \_\_\_\_\_, 2025.

**UNITED STATES DISTRICT JUDGE  
JAMES WESLEY HENDRIX**