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3 District of Arizona  
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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF ARIZONA**

16 Toan Sy Le,

17 Petitioner,

18 v.

19 Fred Figueroa, *et al.*,

20 Respondents.

No. CV-25-04130-PHX-SMB (CDB)

**JOINT STIPULATION FOR  
EXTENSION OF TIME TO  
RESPOND  
(First Request)**

21 Petitioner and Respondents, through undersigned counsel and pursuant to Federal  
22 Rule of Civil Procedure 6(b) and Local Rule of Civil Procedure 7.3, seek an order  
23 extending the deadline to respond to Petitioner's Motion for Preliminary Injunction to and  
24 until December 23, 2025, at 5:00 p.m. and extending Petitioner's deadline to reply until  
25 Saturday, January 3, 2026, at 5:00 p.m. This is the first request for an extension by the  
26 parties.

27 On December 15, 2025, the Court entered an Order (Doc. 15) directing Respondents  
28 to respond to Petitioner's renewed Motion for Preliminary Injunction (Doc. 8) by  
December 17, 2025. Due the flooding of emergent immigration litigation in this District,  
counsel for Respondents had twenty responses in habeas petitions, motions for injunctive

1 relief, and orders to show cause, due this week alone. Counsel for Respondents did his best  
2 to comply with the deadlines in these cases and apologizes to the Court for failing to timely  
3 comply with its deadline in this matter. Counsel for Petitioner brought the error to counsel  
4 for Respondents' attention, and the parties have agreed that a brief extension of time to  
5 finish briefing the preliminary injunction is appropriate.

6 Accordingly, the parties jointly request that the Court extend Respondents' deadline  
7 to file their response to Petitioner's Motion for Preliminary Injunction until 5:00 p.m. on  
8 Tuesday, December 23, 2025, and Petitioner's deadline to reply until 5:00 p.m. on  
9 Saturday, January 3, 2026. This requested extension will not result in a significant delay  
10 in this case, and the parties affirm it is not sought for any improper purpose.

11 For the reasons set forth above, the parties request that the Court extend the briefing  
12 deadlines as proposed above.

13 RESPECTFULLY SUBMITTED December 19, 2025.

14 TIMOTHY COURCHAINED  
15 United States Attorney  
16 District of Arizona

17 s/ Brooks Chupp  
18 BROOKS CHUPP  
19 Assistant United States Attorney  
20 Attorneys for Respondents

21 s/ Daniel M Huynh (with permission)  
22 Daniel M Huynh, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing:

s/ M. Beickert  
U.S. Attorney's Office