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10 *Counsel for Petitioners*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA (Las Vegas)**

13 **L. M., V.M., and R.L.,**
14 *Petitioners,*

Case No.: 2:25-cv-2194-APG-BNW

15 v.

16 **KRISTI NOEM, U.S. DEPARTMENT OF**
HOMELAND SECURITY, PAMELA J.
17 **BONDI, U.S. DEPARTMENT OF**
JUSTICE, TODD LYONS, JASON
18 **KNIGHT, U.S. IMMIGRATION AND**
19 **CUSTOMS ENFORCEMENT, JOHN**
20 **MATTOS,**

PETITIONER'S POSITION REGARDING
RESPONDENTS' REQUEST FOR
EXTENSION OF TIME

21 *Respondents.*
22

23
24 Petitioners have no objection to Respondents' request to extend time to answer the
25 Petition for Writ of Habeas Corpus. However, Petitioners were not contacted for their position
26 before Respondents' request, and note that this extension will prolong Petitioners' detention in
27 violation of the law. Therefore, if the extension in time is granted, Petitioners respectfully
28

1 request that the Court expedite consideration of Petitioners' Application for a Temporary
2 Restraining Order, or, in the alternative, a Preliminary Injunction because Petitioners will face
3 continued irreparable harm. Petitioners have been detained for nearly six months.

4 On November 6, 2025, Petitioners filed a Petition for Writ of Habeas Corpus. ECF No.
5
6 1. That same day, Petitioners filed the accompanying Exhibits to the Petition. ECF No. 1-2. On
7 November 10, 2025, Petitioners filed an Application for Temporary Restraining Order ("TRO"),
8 or, in the alternative, a Preliminary Injunction. ECF No. 2. On November 12, the Court ordered
9 the Petition served on Respondents, and set a deadline for Respondents to answer the Petition
10 seven days later on November 19. ECF No. 3. The Court did not address Petitioners' request for
11 a TRO or PI, but the rapid schedule to for the answer largely mitigated the need for interim
12 action. That will be less true if the timeline is extended.

13
14 In the absence of a temporary restraining order or preliminary injunction, Petitioners
15 will suffer continuing injury through continued detention and thus ask the Court to consider
16 their application for interim relief.

17 DATED this 16th day of November, 2025.

18
19 Respectfully Submitted,

20 /s/Michael Kagan
21 Michael Kagan
22 Nevada Bar. No. 12318C

23 /s/ Victoria Callier
24 Victoria Callier
25 Student Attorney Practicing
26 Under Nevada Supreme Court Rule 49.3

27 /s/ Katrina Pineda
28 Katrina Pineda
Student Attorney Practicing
Under Nevada Supreme Court Rule 49.3

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