

Laura Lui (NV Bar 5535)
FILLMORE SPENCER LLC
5902 Simons Drive
Reno, NV 89523
Telephone: (801) 590-9263
llui@fslaw.com

Attorney for Petitioners

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Julian Flores Marquez,
Israel Garcia Plancarte.

Petitioners,

v.

Jason Knight, Acting Las Vegas/Salt Lake
City Field Office Director, Enforcement
and Removal Operations, United States
Immigration and Customs Enforcement
(ICE); John Mattos, Warden, Nevada
Southern Detention Center; Todd Lyons,
Acting Director, United States
Enforcement and Removal Operations;
Kristi NOEM, Secretary, United States
Department of Homeland Security;
Pamela BONDI, Attorney General of the
United States; Executive Office for
Immigration Review

Respondents.

**OPPOSITION TO MOTION TO
EXTEND TIME**

Case No. 2:25-cv-02203

COMES NOW Petitioners et al, by and through counsel T Laura Lui of FILLMORE SPENCER LLC, and oppose Respondents Motion to Extend Time to respond to the Court's Order dated November 12, 2025. The Court's Order states: "Thus, pursuant to 28 U.S.C. § 2243,

Respondents are ORDERED TO SHOW CAUSE in writing by filing return certifying the true cause of detention no later than 5:00 p.m. on November 14, 2025, on why the Court should not grant the Petition. Petitioners may file a traverse no later than November 18, 2025.” The information requested from Respondents pursuant to the Order is not complicated and does not require additional time. Respondents should be readily able to answer the true cause of detention of Petitioners beyond an erroneous and illegal reading of the mandatory detention regulations. The fact that they cannot do so within the time allotted provides further evidence of the illegal detention of Petitioners. Additionally, Petitioners continue to be illegally detained in the Nevada Southern Detention Center.

Petitioner request that the Court deny the Motion to Extend Time filed by Respondents and if no valid cause of detention is filed by the November 14, 2025, deadline, grant Petitioners ‘ Petition.

RESPECTFULLY SUBMITTED this 13th day of November, 2025.

FILLMORE SPENCER LLC

/s/ T Laura Lui
Attorney for Petitioners