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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 SECOND
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 Second 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.” Once again, Petitioners argue that 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. A review of the attached I-213’s filed by Respondents in each of the cases shows that there are no other reasons for their illegal detention beyond the erroneous reading by the Respondents of the regulations. Petitioners continue to be illegally detained in the Nevada Southern Detention Center while Respondents are on a fishing expedition to find evidence that simply is not there.

Petitioner request that the Court deny the First and Second Motion to Extend Time filed by Respondents and since no valid cause of detention was filed by the November 14, 2025, deadline, grant Petitioners’ Petition and release the Petitioners on a bond of \$1,500.00 each.

RESPECTFULLY SUBMITTED this 18th day of November, 2025.

FILLMORE SPENCER LLC

/s/ T Laura Lui
Attorney for Petitioners

EXHIBIT LISTS

A. I-213 for Julian Flores Marquez

B. I-213 for Israel Garcia Plancarte

TAB A

U.S. Department of Homeland Security

Subject ID



Record of Deportable/Inadmissible Alien

Family Name (CAPS) FLORES-MARQUEZ, JULIAN		First	Middle
Country of Citizenship MEXICO	Passport Number and Country of Issue 		
U.S. Address CO ICE CUSTODY 2190 E MESQUITE AVE PAHRUMP, NEVADA, 89060,			
Date, Place, Time, and Manner of Last Entry 03/01/2001 Unknown Time, SYS, WI-Without Inspection		Passenger Boarded at	
Number, Street, City, Province (State) and Country of Permanent Residence UNKNOWN SOMBRERETE, ZACATECAS, MEXICO			
Date of Birth 	Age: 45	Date of Action 08/06/2025	Location Code PRU/SLC
City, Province (State) and Country of Birth Sombrerete, ZACATECAS, MEXICO		AR <input checked="" type="checkbox"/>	Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>
NIV Issuing Post and NIV Number		Social Security Account Name	
Date Visa Issued		Social Security Number	

Sex M	Hair BRO	Eyes BRO	Complexion MBR
Height 62	Weight 185	Occupation Unemployed	
Scars and Marks			
F.B.I. Number 		<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated	
Method of Location/Apprehension CA			
At/Near See I-831		Date/Hour 08/06/2025 08:18	
By R. 6291 NICOLAS			
Status at Entry		Status When Found	
Length of Time Illegally in U.S.			

Immigration Record POSITIVE - See Narrative	Criminal Record See Narrative
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate) GARCIA, GLORIA NATIONALITY: MEXICO	Number and Nationality of Minor Children 2-UNITED STATES
Father's Name, Nationality, and Address, if Known FLORES, JOSE NATIONALITY: MEXICO	Mother's Present and Maiden Name, Nationality, and Address, if Known MARQUEZ-BARRERA, JUANA NATIONALITY: MEXICO
Monies Due/Property in U.S. Not in Immediate Possession None Claimed	Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name and Address of (Last)(Current) U.S. Employer	Type of Employment
	Systems Checks See Narrative
	Charge Code Word(s) See Narrative
	Salary
	Employed from/to Hr

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)



Left Index fingerprint



Right Index fingerprint



IMMIGRATION RECORD
 History was expected but not provided
 Subject Health Status
 On medication for Hypertension, Reflux, and Depression
 Current Administrative Charges ... (CONTINUED ON I-831)

Alien has been advised of communication privileges 8-6-25 RL (Date/Initials)
 R. 6291 NICOLAS DO (Signature and Title of Immigration Officer)

Distribution:	Received: (Subject and Documents) (Report of Interview) Officer: R. 6291 NICOLAS on: August 6, 2025 (time) Disposition: Warrant of Arrest/Notice to Appear Examining Officer: WHITELY, J. 4852
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U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name FLORES-MARQUEZ, JULIAN	File Number [REDACTED] Event No: [REDACTED]	Date 08/06/2025
<p>Previous Criminal History ----- On 03/05/2006, the subject was arrested for the crime of "Driving Under Influence Liquor" which resulted in a conviction on 04/03/2006. The subject was sentenced to N/A.</p> <p>RECORDS CHECKED ----- EARM Pos TECS Pos</p> <p>AT/NEAR ----- Spanish Fork, UT</p> <p>Record of Deportable/Excludable Alien: -----</p> <p>ENCOUNTER DATA Subject, FLORES-Marquez, Julian, was encountered at the Utah County Jail on 07/27/2025. FLORES stated that he is a citizen and national of Mexico by virtue of birth. FLORES was not in possession of valid immigration documents allowing him to be or remain in the United States legally.</p> <p>ENTRY DATA FLORES stated that he entered the United States on or about 03/01/2001 at or near San Ysidro, CA, without inspection by U.S. Immigration Officers. This location was not designated as a port of entry by the Attorney General or the Secretary of the Department of Homeland Security.</p> <p>IMMIGRATION HISTORY On 07/13/2008, FLORES applied for a B1/B2 non-immigrant visa. It was denied on 07/14/2008. On 08/18/2008, FLORES applied for a B1/B2 non-immigrant visa. It was denied on 08/19/2008. When presented with this information, FLORES again stated that he entered the United States on 03/01/2001.</p> <p>CRIMINAL HISTORY On 04/03/2006, FLORES was convicted by the 4th District Court, Utah County, Utah for Driving Under the Influence, a Misdemeanor, for which he was sentenced to a fine. Case [REDACTED] On 07/26/2025, FLORES was arrested for Assault / Domestic Violence, a Misdemeanor. This case is pending with the 4th District Court, Utah County, Utah. Case [REDACTED] On 07/26/2025, FLORES was arrested for Domestic Violence in the Presence of a Child (2 charges), both Misdemeanors. This case is pending with the 4th District Court, Utah County, Utah. Case [REDACTED]</p> <p>SQ-11/NN-13 records check for outstanding wants, warrants, and lookouts were negative.</p> <p>BASIS FOR ICE CHARGES FLORES makes no claim to USC or LPR and is amenable to removal under section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that FLORES is an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.</p>		
Signature R. 6291 NICOLAS	Title DO	

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U.S. Department of Homeland Security

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Alien's Name FLORES-MARQUEZ, JULIAN	File Number [REDACTED] Event No: [REDACTED]	Date 08/06/2025
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FLORES is also amendable to removal under section 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act, as amended in that FLORES is an alien who at the time of application for admission, is in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

DISPOSITION

FLORES was advised of his right to speak to a consulate officer from Mexico.
 FLORES did not claim fear of persecution or torture if removed to Mexico.
 FLORES does have an I-130, Petition for Alien Relative, that was approved on 08/26/2022. It was filed by his adult USC daughter.
 FLORES requested a hearing before an immigration judge.
 FLORES was issued a Notice to Appear.
 FLORES was provided a list of free legal services.
 FLORES was provided a copy of the On-line Detainee Locator System privacy notice.
 FLORES will be held in ICE custody pending removal proceedings.
 FLORES claims he did not attend/graduate high school in the United States.
 FLORES claims he did not receive a G.E.D. or equivalent.
 FLORES claims he did not serve in the United States military.
 FLORES claims to have 3 children. 3 USC daughters.
 FLORES claims to be married. Claims to be married to Gloria Garcia, a Mexican citizen, who he claims has no legal immigration status in the United States.
 FLORES is currently taking medication for Hypertension, Reflux, and Depression.
 FLORES declined to make a phone call on 08/06/2025 at 0800.
 Refusal witnessed by Officer Nicolas.

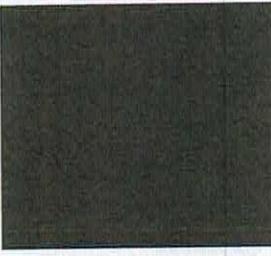
Other Identifying Numbers

[REDACTED]

Signature R. 6291 NICOLAS	[Signature]	Title DO
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TAB B

U.S. Department of Homeland Security Subject ID : XXXXXXXXXX Record of Deportable/Inadmissible Alien

Family Name (CAPS) GARCIA-PLANCARTE, ISRAEL		First	Middle	Sex M	Hair BLK	Eyes BRO	Complexion MED
Country of Citizenship MEXICO	Passport Number and Country of Issue XXXXXXXXXX		Entry Number XXXXXXXXXX	Height 65	Weight 180	Occupation none	
U.S. Address 2023 W 1465 N SAINT GEORGE, UTAH, 84770,				Scars and Marks See Narrative			
Date, Place, Time, and Manner of Last Entry Unknown Date Unknown Time, UNK, WI-Without Inspection			Passenger Boarded at	FBI Number XXXXXXXXXX		<input checked="" type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated	
Number, Street, City, Province (State) and Country of Permanent Residence MICHOACAN, MEXICO				Method of Location/Apprehension CA			
Date of Birth XXXXXXXXXX	Age: 47	Date of Action 10/16/2025	Location Code TOD	At/Near See I-831	Date/Hour 10/16/2025 07:45		
City, Province (State) and Country of Birth MICHOACAN, MEXICO		AR <input checked="" type="checkbox"/>	Form: (Type and No.) Labeled <input type="checkbox"/> Not Labeled <input type="checkbox"/>	By XXXXXXXXXX			
NIV Issuing Post and NIV Number		Social Security Account Name		Status at Entry	Status When Found		
Date Visa Issued		Social Security Number		Length of Time Illegally in U.S.			
Immigration Record NEGATIVE			Criminal Record See Narrative				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)					Number and Nationality of Minor Children 1-UNKNOWN		
Father's Name, Nationality, and Address, if Known GARCIA, PEDRO NATIONALITY: MEXICO			Mother's Present and Maiden Names, Nationality, and Address, if Known PLANCARTE, ALICIA NATIONALITY: MEXICO				
Monies Due Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative	Charge Code Word(s) See Narrative			
Name and Address of (Last) Current U.S. Employer		Type of Employment See Narrative	Salary	Employed from to			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)							
FIN: XXXXXXXXXX		Left Index fingerprint			Right Index fingerprint		
							
SCARS MARKS AND TATTOOS None Indicated - None Indicated							
Subject Health Status The subject claims good health.							
Current Administrative Charges ... (CONTINUED ON I-831)							
Alien has been advised of communication privileges 10/16/2025			Date Initials AW		Signature and Title of Immigration Officer XXXXXXXXXX		
Distribution				Received (Subject and Documents) (Report of Interview)			
				Officer XXXXXXXXXX			
				on October 16, 2025 (Time)			
				Disposition XXXXXXXXXX			
				Examining Officer XXXXXXXXXX			

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Continuation Page for Form I-213

Alien's Name GARCIA-PLANCARTE, ISRAEL	File Number [REDACTED] Event No: [REDACTED]	Date 10/16/2025
10/15/2025 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs)		
RECORDS CHECKED [REDACTED]		
TYPE OF EMPLOYMENT Occupation Not Reported		
AT/NEAR Hurr cane, UT		
Record of Deportable/Excludable Alien:		
ENCOUNTER DATA		
On October 15th, 2025, Subject GARCIA-Plancarte, Israel was encountered at the Washington County Jail. GARCIA stated that he is a citizen and national of Mexico by virtue of birth. GARCIA was not in possession of valid immigration documents allowing him to be or remain in the United States legally.		
ENTRY DATA		
GARCIA stated that he entered the United States on or about December 2006, at or near Arizona, without inspection by U.S. Immigration Officers at the age of 28. This location was not designated as a port of entry by the Attorney General or the Secretary of the Department of Homeland Security. GARCIA stated this is his first and only entry into the United States.		
IMMIGRATION HISTORY		
DHS database checks indicate no prior immigration history for GARCIA.		
CRIMINAL HISTORY On October 11th, 2025, GARCIA was charged in the Fifth Judicial District - Washington County Justice Court, for the offense of Public Intoxication, in violation of 76-9-110, a Class C Misdemeanor, for which the case is pending. Case No. [REDACTED] records check for outstanding wants, warrants, and lookouts were negative.		
BASIS FOR ICE CHARGES		
GARCIA makes no claim to USC or LPR and is amenable to removal under section 212(a) (6) (A) (i) of the Immigration and Nationality Act, as amended, in that GARCIA is an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.		
DISPOSITION		
GARCIA was advised of his right to speak to a consulate officer from Mexico. GARCIA states he has no fear of persecution or torture if removed to Mexico. GARCIA has no immigration petitions or applications pending or approved. GARCIA requested a hearing before an immigration judge. GARCIA was issued a Notice to Appear. GARCIA was provided a list of free legal services.		
[REDACTED]	Title military support	

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Alien's Name GARCIA-PLANCARTE, ISRAEL	File Number [REDACTED]	Date 10/16/2025
Event No: [REDACTED]		

GARCIA was provided a copy of the On-line Detainee Locator System privacy notice.
 GARCIA will be held in ICE custody pending removal from the United States.
 GARCIA claims not attend/graduate high school in the United States.
 GARCIA claims did not receive a G.E.D. or equivalent.
 GARCIA claims did not serve in the United States military.
 GARCIA claims to have 2 children. 1 USC daughter, 1 USC son.
 GARCIA claims to be single.
 GARCIA claims to be in good health and states he is not currently under the care of a physician and is not taking any medications.

GARCIA refused to make a phone call on October 15th, 2025, at 13:00.
 Refusal witnessed by Officer A. McDermott.

Other Identifying Numbers

 Other Biometric- [REDACTED]
 State Criminal Number/State Bureau Number- [REDACTED] (UNITED STATES)

Title
military support

