



**U.S. Department of Justice**

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January 20, 2026

**By ECF**

Hon. Michael E. Farbiarz, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Frank Lautenberg Post Office & U.S. Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *Martinez Ron v. Lyons*, No. 25-17359-MEF  
Request for Additional Time to Address Petitioner's  
Supplemental Argument**

Dear Judge Farbiarz:

This Office represents Respondents in this § 2241 habeas matter filed by a noncitizen challenging the legality of his detention by U.S. Immigration and Customs Enforcement ("ICE"). We write to request additional time to respond to Petitioner's examination of the bond hearing transcript, which we believe was just introduced into the record of this case today.

Respondents were unaware that Petitioner obtained and planned to discuss the bond hearing transcript. In his last filing before this Court, Petitioner stated that "Petitioner's argument is not that the immigration judge improperly evaluated the evidence[.]" ECF No. 28 at 2. Today, Respondents had planned to stand on their arguments in their answer to the amended complaint at ECF No. 22. However, Respondents would respectfully request an extension to Monday, January 26, 2025 to review the hearing transcript and respond to Petitioner's new arguments about it.

Respectfully submitted,

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U.S. Deputy Attorney General

JORDAN FOX  
Chief of Staff & Associate Deputy  
Attorney General  
Special Attorney

By: */s/ John T. Stinson*  
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cc: Counsel of Record