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5
6 IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

7 Edin Eleazar Quinonez Orosco,
8 Petitioner,

Case No.: 2:25-cv-2240

9 vs.

**PETITIONER’S OPPOSITION TO
RESPONDENT’S MOTION TO EXTEND TIME**

10 Todd M. Lyons, Acting Director Immigration & Customs
11 Enforcement, John Doe, Acting Las Vegas/Salt Lake City
Field Office Director, Enforcement and Removal
12 Operations, United States Immigration and Customs
Enforcement (Ice); John Mattos, Warden, Nevada
13 Southern Detention Center; Kristi Noem, Secretary,
United States Department of Homeland Security; Pamela
14 Bondi, Attorney General of the United States; Sirce
Owen, Executive Office for Immigration Review,

15 Respondents.

16 Federal Respondents have filed a motion for extension of time to respond to the Court’s
17 Order to Show Cause (ECF No. 12) requesting 5 additional days due to medical leave, a shortage of staffing and
18 having responses due in several other cases.

19 While Petitioner’s counsel is very sympathetic to opposing counsel’s medical leave, counsel must
20 oppose any extension because it extends the unlawful detention of the petitioner who is separated from his family
21 regardless of their medical, financial or personal issues.

22 Government counsel indicates that she has medical leave starting on the day that the response is
23 due and that she has two other responses due in similar matters. However, counsel does not explain why she could
24 not use the time she spent on preparing a motion for extension and the days prior to her leave to respond.

25 Petitioner’s counsel is one of three attorneys in a small firm and has hundreds of immigration cases, several in
26 federal court and multiple appeals and also teaches Immigration Law at the S.J. Quinney College of Law but has had
27 to set aside time during or after business hours to get the Habeas filed so her client need not be detained contrary to
28

1 law any longer than needed. No circumstances presented by government counsel should outweigh the continued
2 unlawful detention of the petitioner.

3 Government counsel's client is responsible for the untenable position that counsel finds herself in.
4 Petitioner is not responsible, and he should not need to remain detained any longer. The government is opposing
5 Habeas cases around the country and is thus aware of and experienced in handling these issues given its unlimited
6 resources. In addition, the government has had ample opportunities to brief the current issues in cases before this
7 court and must have a template response prepared to file in this and every other case.

8 For this reason, there is no fact specific information required from DHS to respond to the current
9 Petition. The sole legal issue is whether the immigration court has jurisdiction to consider bond under the statute and
10 regulations. This is a strictly legal issue that the government has already briefed and is well aware of the court's
11 findings in other cases.

12 Under normal circumstances, Petitioner would not object to a continuance. However, these
13 circumstances are anything but normal given the allegations of unlawful detention based on new policy, so
14 Petitioners must object to any extension of time to respond because good cause for the motion has not been
15 established. If the court is inclined to grant an extension, Petitioner request the shortest time possible.

16 RESPECTFULLY SUBMITTED this 20th day of November, 2025.

17 PERRETTA LAW OFFICE

18 /s/ Leonor Perretta
19 Attorney for Petitioner