

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

SEAMUS THOMAS CULLETON,)	
)	
PETITIONER,)	Docket No. 3:25-cv-554
)	
v.)	
)	
)	
MARY DE ANDA-YBARRA , Field Office Director)	
ERO of U.S. Immigration and Customs Enforcement)	
TODD LYONS , Acting Director, U.S Immigration)	
and Customs Enforcement)	
KRISTI NOEM ; Secretary of the U.S. Department)	
Homeland Security;)	
)	
PAMELA BONDI , Attorney General of the United)	
States, and)	
)	
ANGEL GARITE , in his official capacity)	
as Assistant Field Office Director of the El Paso Field)	
Office of U.S. Immigration and Customs)	
Enforcement and Enforcement Removal Operations,)	
)	
RESPONDENTS.)	
)	

**PETITIONER’S OPPOSITION AND REPLY TO RESPONDENT’S REQUEST TO
CONTINUE THE HEARING SCHEDULED FOR JANUARY 16, 2026.**

Now comes Petitioner, Seamus Culleton, through Counsel and respectfully submits the
aforementioned reply and opposition to the Respondent’s request to continue the hearing
scheduled for January 16, 2026.

At no time did the respondents confer with the Petitioner’s Counsel for the Continuance.
The Petitioners' Counsel learnt of the Respondent’s Motion by ECF system notification as she was
boarding a flight from Boston to Texas this morning. She is already in Texas and has a scheduled

appointment with the Petitioner this afternoon at the detention center in preparation for tomorrow's hearing.

The Petitioner's Counsel has previously moved trial dates to accommodate the Court's directives and the hearing, and the Respondent's continuous excuses to postpone the hearing have further denied the Petitioner expeditious justice and also caused financial strain.

WHEREFORE, Counsel respectfully requests this Honorable Court to deny the Respondent's continuance and proceed with the hearing on January 16, 2025. If the Court is inclined to grant the continuance, we request that the Petitioner be released pending hearing of the matter.

Respectfully submitted,

/s/ Ogor Winnie Okoye

Ogor Winnie Okoye, Esq.
BOS Legal Group, LLC.
41 Ocean Street, Unit 1
Lynn, MA 01902
Tel/Fax: (339) 440-5010
EOIR: UE299675
Email: owo@boslegals.com

Pro hac vice admitted Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Ogor Winnie Okoye, do hereby certify that this document and the documents below filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF):

Respectfully submitted,
Ogor Winnie Okoye, Esq.
/s/ Ogor Winnie Okoye
BOS Legal Group, LLC.
41 Ocean Street, Unit 1
Lynn, MA 01902
Tel/Fax: (339) 440-5010
EOIR: UE299675
Email: owo@boslegals.com

Pro hac vice admitted Counsel for Petitioner