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8 *Attorneys for the Federal Respondents*

9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 YAKY HOWARD MEJIA SOTO,

11 Petitioner,

12 v.

13 REGGIE RADER, Police Chief, Henderson  
 14 Detention Center; MICHAEL BERNACKE,  
 Field Office Director, U.S. Immigration and  
 15 Customs Enforcement; SUMMER  
 JOHNSON, US District Attorney for the  
 16 District of Nevada; PAMELA BONDI,  
 Attorney General of the United States; and  
 17 KRISTI NOEM, Secretary of Homeland  
 Security, in their official capacities,

18 Respondents.  
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Case No. 2:25-cv-02281-RFB-EJY

**Joint Stipulation for Retroactive  
 Extension of Time for Federal  
 Respondents to File a Response to the  
 Motion for Attorney’s Fees  
 (ECF No. 12)**

**(First Request)**

20 Petitioner Yaky Howard Mejia Soto (“Petitioner”) and Federal Respondents

21 Michael Bernacke, Summer Johnson, Pamela Bondi and Kristi Noem (“Federal

22 Respondents”), through undersigned counsel, hereby agree to and submit this Stipulation

23 for a retroactive extension of time for Federal Respondents to File a Response to

24 Petitioner’s Motion for Attorney Fees (ECF No. 12), from December 26, 2025, to **January**

25 **9, 2026**. This extension is necessary because of overlapping court-ordered deadlines in

26 multiple immigration matters and undersigned counsel’s previously approved international

27 family leave from December 22, 2025, through January 2, 2026. This request for an

28 extension is filed retroactively because the United States Attorney’s Office was closed from

1 December 24 to December 26, and because support staff for undersigned counsel – who is  
2 still on international leave – was unexpectedly out of the office on December 29, 2025, due  
3 to flight cancellations and delays. The parties had previously agreed to the extension on  
4 December 23, 2025, but the stipulation could not be filed until today.

5 Accordingly, the parties respectfully request that the Court approve this stipulation  
6 and retroactively extend the deadline for Federal Respondents to file a response to  
7 Petitioner’s motion for attorney fees from December 26, 2025, to **January 9, 2025**. This is  
8 the first request for an extension of time to respond to Petitioner’s motion. This request is  
9 made in good faith and not for the purpose of undue delay.

10 Respectfully submitted this 30th day of December 2025.

11 LAW OFFICE OF DAVID E. WALTERS

SIGAL CHATTAH  
First Assistant United States Attorney

13 /s/ David E. Walters  
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*Attorney for Petitioner*

/s/ Christian R. Ruiz  
CHRISTIAN R. RUIZ  
Assistant United States Attorneys

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24 **IT IS SO ORDERED:**

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26 \_\_\_\_\_  
**U.S. DISTRICT/MAGISTRATE JUDGE**

27 **DATED:** \_\_\_\_\_  
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