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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Carlos Sanchez-Camacho,

Petitioner

v.

KRISTI NOEM, in her official capacity as  
Secretary of the Department of Homeland  
Security,

TODD LYONS, in his official capacity as  
Acting Director of Immigration and Customs  
Enforcement,

MARCOS CHARLES, in his official capacity  
as ICE Field Officer Director,

JOHN MATTOS, in his official capacity as the  
warden of the Nevada Southern Detention  
Facility,

PAMALA BONDI, in her official capacity as  
the United States Attorney General,

The Executive Office for Immigration Review

United States Immigration and Customs  
Enforcement.

Respondents

Civil No.: 2:25-cv-02343-RFB-DJA

PETITIONER'S OPPOSITION TO  
RESPONDENTS' SECOND MOTION FOR  
AN EXTENSION AND REQUEST TO  
SUBMIT FOR A DECISION

IMMIGRATION HABEAS CASE

1 **PLAINTIFF’S OPPOSITION TO RESPONDENTS’ SECOND MOTION FOR EXTENSION**  
2 **OF TIME AND REQUEST TO SUBMIT FOR A DECISION**

3 **I. INTRODUCTION**

4 Respondents request an additional three-day extension, until December 12, 2025, nearly three  
5 weeks after the habeas petition was filed on November 24, 2025. This is Respondents’ second extension  
6 request. Petitioner opposes further delay, as Respondents have already received ample time to prepare  
7 their response, and additional delay prejudices Petitioner’s liberty interests, which are at stake in this  
8 habeas matter.  
9

10 **II. RESPONDENTS HAVE HAD AMPLE TIME**

11 Respondents were initially required to respond by December 2, 2025, but the Court granted a  
12 stipulated extension to December 9, 2025. The current motion was filed on the day of that extended  
13 deadline, December 9, and relies solely on the fact that counsel is reviewing documents and handling  
14 other habeas cases. Such administrative burdens do not constitute good cause under Ninth Circuit law.  
15 *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992) (good cause requires  
16 diligence and timely request).  
17

18 By filing the motion on the day of the deadline and after receiving a prior extension,  
19 Respondents have demonstrated a lack of diligence in meeting Court deadlines. Courts in this District  
20 routinely deny serial, last-minute requests for extensions where the moving party has already been  
21 afforded additional time.  
22

23 **III. FURTHER EXTENSION PREJUDICES PETITIONER**

24 Habeas corpus is a “speedy remedy” entitled to special, preferential consideration. *Fay v. Noia*,  
25 372 U.S. 391, 400 (1963); 28 U.S.C. § 2243. Every day of delay prolongs Petitioner’s detention without  
26 the opportunity for a bond hearing or judicial review. Granting even a three-day extension would  
27  
28

1 unduly prejudice Petitioner, particularly because the issues presented are primarily legal and could be  
2 resolved on the existing record.

3 **IV. DECISION ON THE RECORD IS APPROPRIATE**

4 Because the Petition raises primarily legal questions, and Respondents have already received  
5 adequate time, the Court may decide the Petition on the existing record without oral argument or  
6 evidentiary hearing. *See Anderson v. United States*, 898 F.2d 751, 753 (9th Cir. 1990).  
7

8 **V. CONCLUSION**

9 For the reasons above, Petitioner respectfully requests that the Court:

- 10 1. Deny Federal Respondents' Motion for Extension of Time (ECF No. 10);  
11 2. Refuse to grant any extension beyond December 9, 2025; and  
12 3. Decide the habeas petition on the current record without further delay or hearing.  
13

14 DATED: December 10, 2025  
15  
16

17 Respectfully submitted,  
18

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