

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Moboalji Olufunmilayo AOKO

Petitioner,

No.8:25-cv-03901-JRR

v.

Kristi Noem, et. al

Respondents.

**PETITIONER'S MOTION TO ACCEPT LATE FILING OF PETITIONER'S REPLY TO
RESPONDENTS' RESPONSE TO PETITION FOR HABEAS CORPUS AND MOTION
TO DISMISS WITH EXPLANATION**

Petitioner, by and through undersigned counsel, submits this Motion to Accept Late Filing of Petitioner's Reply to Respondents' Response to Petition for Habeas Corpus and Motion to Dismiss With Explanation.

Petitioner respectfully acknowledges and sincerely apologizes that the Reply was filed after the deadline set by this Honorable Court. At the December 1, 2025, telephonic status and scheduling conference, in this case, the Court set deadlines, including that our reply to Respondent's response would be due on December 17, 2025. For unknown reasons, the December 17, 2025, reply date was inadvertently not calendared in our office deadline system. Undersigned counsel was extremely busy in December and left the United States a few days before Christmas and did not return until early this month. Counsel was preparing to leave town while managing an

unusually heavy caseload, including many habeas corpus filings. My associate filed our reply on December 29, 2025, not knowing that it was already late. The delay was inadvertent, not the result of bad faith, and it did not likely prejudice Respondents.

Wherefore, Petitioner respectfully requests this Honorable Court to accept the late filing of Petitioner's Reply to Respondents' Response to Petition for Habeas Corpus and Motion to Dismiss With Explanation. Our sincere apologies for the delay in filing.

Dated: January 14, 2026

Respectfully submitted,

/s/ Ronald D. Richey
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ORDER

Upon consideration of Petitioner's Reply to Respondents' Response to Petition for Habeas Corpus and Motion to Dismiss With Explanation, it is on this ____ day of January 2026, by the United States District Court for the District of Maryland:

ORDERED that Pctitioner's Reply to Respondents' Response to Petition for Habeas Corpus and Motion to Dismiss With Explanation be GRANTED.

The Honorable Judge Julie Rebecca Rubin
United States District Judge