



U.S. Department of Justice

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December 31, 2025

By ECF

Hon. Karen M. Williams, U.S.D.J.
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

**Re: *Sanango v. Soto*, No. 25-cv-18328
Request for 12-hour extension**

Dear Judge Williams:

This Office represents Respondents in this habeas matter in which Petitioner Manuel Jesus Sanango seeks release from detention. We write to request, *nunc pro tunc*, an extension of 12 hours to file an answer to the Petition. Our answer to the Petition was due at noon today, December 31, 2025. We apologize for missing this deadline. If the Court grants the extension, Respondents shall have until midnight tonight, December 31, 2025, to file their answer. We respectfully propose that Petitioner have until at least 5 p.m. on Friday, January 2, 2026, to respond to our answer.

Respondents respectfully submit that good cause exists for the extension request. The Court issued its order to answer at 1:29 p.m. on December 29, 2025. Owing to the volume of emergent matters affecting this Office and U.S. Immigration and Customs Enforcement ("ICE"), Respondents were unable to confirm until late morning today that Petitioner is subject to a final order of removal and collect the records necessary to respond to the Court's order and determine whether "Petitioner's detention is distinguishable from the cases in this district previously addressing § 1225[.]" ECF No. 3. Nonetheless, Respondents can file an answer within 12 hours of the original deadline, by midnight on December 31, 2025, which will keep this matter on an expedited schedule.

If this proposal is acceptable to the Court, we respectfully request that Your Honor “so order” this letter and have the Clerk’s Office file it on the docket. Thank you very much for your time and consideration of this request.

Respectfully submitted,

TODD BLANCHE
U.S. Deputy Attorney General

JORDAN FOX
Chief of Staff & Associate Deputy
Attorney General
Special Attorney

By: /s/ John T. Stinson
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cc: Counsel of Record (by ECF)