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

10 JOSE ROJAS-LARA,
 11
 12 Petitioner,
 v.
 13 THE UNITED STATES OF AMERICA,
 Kristi NOEM, in her Official Capacity,
 14 Secretary of the Department of Homeland
 Security, Pamela J. BONDI, in her Official
 15 Capacity, Attorney General, Department of
 Justice, Kerri Ann QUIHUIS, in her Official
 16 Capacity, ICE Field Office Director,
 Detention and Removal, Las Vegas, Nevada
 17 (ICE Local) Michael BERNACKE, in his
 Official Capacity, Field Office Director, Salt
 18 Lake City Field Office, U.S. Immigration
 and Customs Enforcement, Todd LYONS,
 19 in his Official Capacity, Acting Director,
 Immigration & Customs Enforcement,
 20 John MATTOS, in his Official Capacity,
 Warden of Immigration Detention Facility,
 21 Nevada Southern Detention Center,
 22 Respondents.
 23

Case No. 2:25-cv-02544-RFB-EJY

**Federal Respondents' UNOPPOSED
 Motion for Extension of Time to File a
 Response to the Order to Show Cause
 regarding the Petition for Writ of
 Habeas Corpus**

24 Federal Respondents United States of America, Kristi Noem, Pamela Bondi, Kerri
 25 Ann Quihuis, Michael Bernacke and Todd Lyons through undersigned counsel, move this
 26 Court for a one-week extension from December 29, 2025, **to and including January 5,**
 27 **2026**, in which to file a response to the Petitioner Jose Rojas-Lara's Petition for Writ of
 28 Habeas Corpus.

1 On December 29, 2025, Federal Respondents spoke with Petitioner’s counsel
2 regarding the requested extension. Petitioner’s counsel stated that she is not opposed to the
3 extension, but that she will not grant further extensions. *See* Electronic Correspondence,
4 attached as Exhibit A. This extension is necessary because undersigned AUSA is still
5 awaiting information from the agency regarding this Petitioner which is essential to
6 completing responses to Petitioner’s claims in his petition. This is the first request for an
7 extension of time to respond to the petition. This request is made in good faith and not for
8 the purpose of undue delay.

9 **Memorandum of Points and Authorities**

10 On December 19, 2025, Petitioner filed his Petition for Writ of Habeas Corpus. ECF
11 No. 1. On December 22, 2025, the Court issued an order for Respondents to respond by
12 December 29, 2025, to an order to show cause as to why the petition should not be granted.
13 ECF No. 4. The requested extension is necessary for the Federal Respondents to receive the
14 necessary information from the agency to address Petitioner’s claims in his petition.

15 Under Federal Rule of Civil Procedure 6(b), a court may, “for good cause,” extend
16 a deadline if a request is made “before the original time or its extension requires.” Fed. R.
17 Civ. P. 6(b)(1)(A); *see also* Local Rule IA 6-1(a). The Ninth Circuit has equated good cause
18 with the exercise of due diligence. *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604,
19 609 (9th Cir. 1992). Additionally, Fed. R. Civ. P. 6(b)(1) should “be liberally construed to
20 effectuate the general purpose of seeing that cases are tried on the merits,” and “requests
21 for extensions of time made before the applicable deadline has passed should normally be
22 granted in the absence of bad faith or prejudice to the adverse party.” *Ahanchian v. Xenon*
23 *Pictures, Inc.*, 624 F.3d 1253, 1258–59 (9th Cir. 2010) (internal citations omitted). Courts
24 also have inherent authority to manage their own dockets. *Hamilton Copper & Steel Corp. v.*
25 *Primary Steel, Inc.*, 898 F.2d 1428, 1429 (9th Cir. 1990); *Oliva v. Sullivan*, 958 F.2d 272, 273
26 (9th Cir. 1992).

27 The undersigned has acted diligently in requesting the necessary information
28 regarding this Petitioner, to prepare the responses to the petition. However, it has taken

