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10 *Attorney for Petitioner Sam Khamsaen Phetinta

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 12
 13 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

14 Sam Khamsaen Phetinta,
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 16 Petitioner,
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 18 v.
 19 John Mattos, NSDC Warden; Michael
 20 Bernacke, Field Director, West Valley City
 Office of ICE ERO; Todd Lyons, ICE
 Acting Director; Kristi Noem DHS
 Secretary; Pam Bondi, U.S. Attorney
 General, *et al.*,
 21
 22 Respondents.

Case No. 2:25-cv-02564-GMN-BNW
**Stipulation and Order for
 Extension of Time to File Reply to
 Response to Amended Petition**
(FIRST REQUEST)

23 Petitioner and Respondents, through their undersigned counsel, hereby
 24 stipulate and jointly request that the court extend the due date for Petitioner's reply
 25 to Respondents' response to the amended petition by two weeks, up to and including
 26 February 17, 2026. This is Mr. Phetinta's first request for an extension of time.
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2 Petitioner filed his petition for writ of habeas corpus under 28 U.S.C. § 2241
3 on December 29, 2025.¹ This Court appointed the Office of the Federal Public
4 Defender to represent Mr. Phetinta.² Undersigned counsel appeared on January 5,
5 2026,³ and filed an amended petition on January 12, 2026.⁴ After a short extension
6 of time, Respondents filed a response to Phetinta's amended petition on January 27,
7 2026.⁵ Mr. Phetinta's reply to the response is currently due on February 3, 2026.

8 On January 30, 2026, undersigned counsel conferred with counsel for
9 Respondents regarding an extension of time for Mr. Phetinta to file a reply to
10 Respondents' response. Respondents' counsel agreed to a fourteen-day extension,
11 extending the deadline to February 17, 2026. This is Mr. Phetinta's first request for
12 an extension of time.

13 Counsel for Mr. Phetinta requires more time so that she may meet with Mr.
14 Phetinta again prior to filing the reply. Undersigned counsel is also travelling to
15 San Francisco for oral argument to the Ninth Circuit, scheduled for February 10,
16 2026. This two-week extension will allow counsel to meet with Mr. Phetinta and
17 thoroughly complete the reply while also taking into consideration her other case
18 obligations.

19 Undersigned counsel and counsel for Respondents, Richard A. Lopez, have
20 conferred regarding the need for an extension of time to file the reply to response to
21 amended petition and agree on the proposed extension of two weeks. This request is
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24 ¹ ECF No. 4.

25 ² ECF No. 3.

26 ³ ECF No. 6; *see also* ECF No. 7.

27 ⁴ ECF No. 9.

⁵ ECF No. 14.

1 not sought for the purpose of delay but in the interest of justice and the interest of
2 the Petitioner.

3
4 Dated February 3, 2026.

5		Respectfully submitted,
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7		Rene L. Valladares
8	Todd Blanche	Federal Public Defender
9	Deputy Attorney General	
10	<u>/s/ Richard Anthony Lopez</u>	<u>/s/ Kimberly Sandberg</u>
11	Richard Anthony Lopez	Kimberly Sandberg
12	Assistant United States Attorney	Assistant Federal Public Defender

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14 IT IS SO ORDERED:

15
16 UNITED STATES DISTRICT JUDGE

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18 DATED: _____

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