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

10 In re: Dagmar Jesus Diaz-Gonzalez,  
 11  
 12 Petitioner,

Case No. 2:25-cv-02622-JAD-BNW  
**Federal Respondents' Reply in Support  
 of Motion to Extend Time**

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 16 Federal Respondents submit this brief reply solely to clarify diligence and the narrow  
 17 basis for the requested extension.

18 Since receiving the First Amended Petition, Respondents have been actively working  
 19 to ensure that Petitioner receives appropriate medical care while lawfully detained and to  
 20 obtain the facility-specific information necessary to respond accurately to Petitioner's newly  
 21 framed medical and conditions-of-confinement allegations. As part of those efforts,  
 22 Respondents have conferred with Petitioner's counsel regarding Petitioner's asserted  
 23 medical needs and have requested clarification regarding the specific medications and  
 24 dosages at issue. Respondents have also requested confirmation from Petitioner's counsel  
 25 that the sealed medical records accurately reflect the medications and dosages required and  
 26 are awaiting a response. Respondents have additionally been coordinating with detention-  
 27 facility personnel and medical providers to address continuity of care.

28 The requested seven-day extension is not sought to evaluate the statutory basis for

1 detention, which Respondents are prepared to address, but solely to ensure that  
2 Respondents' response accurately reflects Petitioner's current medical care and the  
3 conditions at the detention facility. Respondents remain willing to continue working  
4 cooperatively with Petitioner's counsel to resolve these issues without unnecessary litigation  
5 and to ensure that Petitioner receives appropriate medical care while this matter proceeds.

6 The brief extension requested will not impair Petitioner's ability to seek relief or the  
7 Court's ability to address any request for release, is limited in scope, and is sought in good  
8 faith. For these reasons, Respondents have demonstrated good cause for a brief extension  
9 under Federal Rule of Civil Procedure 6(b)(1)(A). Granting the extension will allow the  
10 Court to receive a complete and accurate response on a fully developed record.

11 Respectfully submitted this 4th day of February 2026.

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16 /s/ Christian R. Ruiz  
17 CHRISTIAN R. RUIZ  
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