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7 Attorneys for Respondents

8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10

11 KHALID MATAN,

12 Petitioner,

13 v.

14 KRISTI NOEM; et al.,

15 Respondents.

Case No.: 26-cv-0024-JES-DDL

**JOINT MOTION TO EXTEND  
RESPONDENTS' TIME TO  
RESPOND**

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20 The parties, through their respective counsel of record, respectfully request an  
21 order modifying the briefing schedule. On January 4, 2026, Petitioner filed a petition  
22 for writ of habeas corpus and motion for temporary restraining order. ECF Nos. 1, 2.  
23 On January 5, 2026, the Court issued an order which, *inter alia*, set Respondents'  
24 deadline to file a response as January 8, 2026. ECF No. 3.

25 The parties jointly and respectfully request this brief extension to allow  
26 Respondents' counsel adequate time to gather all relevant information necessary to draft  
27 a response to the petition and motion for temporary restraining. As such, the parties  
28

1 request that the Court extend Respondents' deadline for filing a response until January  
2 9, 2026, with Petitioner's deadline for filing a reply remaining as January 12, 2026.

3 DATED: January 6, 2026

4 s/ Katie Hurrelbrink  
5 KATIE HURRELBRINK  
6 Attorney for Petitioner

7 DATED: January 6, 2026

8 ADAM GORDON  
9 United States Attorney

10 s/Erin M. Dimbleby  
11 ERIN M. DIMBLEBY  
12 Assistant United States Attorney  
13 Attorneys for Respondents

14 **SIGNATURE CERTIFICATION**

15 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies  
16 and Procedures of the United States District Court for the Southern District of  
17 California, I hereby certify that the content of this document is acceptable to Katie  
18 Hurrelbrink, counsel for Petitioner, and that I have obtained Ms. Hurrelbrink's  
19 authorization to affix her electronic signature to this document.

20 DATED: January 6, 2026

21 s/Erin M. Dimbleby  
22 ERIN M. DIMBLEBY  
23 Assistant United States Attorney  
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