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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 Ali Mohammadi,

12 Petitioner,

13 v.

14 KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
15 Security; TODD LYONS, in his official
capacity as Acting Director of Immigration and
16 Customs Enforcement; THOMAS E.
FREELEY, in his official capacity as ICE Field
17 Officer Director; JOHN DOE in his official
capacity as the warden of the Henderson
18 Detention Facility; PAMELA BONDI, in her
official capacity as the United States Attorney
19 General; The Executive Office for Immigration
Review United States Immigration and
20 Customs Enforcement,

21 Respondents.
22

Case No. 2:26-cv-00032-GMN-EJY

**Joint Stipulation for Extension of
Time for Federal Respondents to File
a Response to the Petition for Writ of
Habeas Corpus (ECF No. 1)**

(Second Request)

23 Petitioner Ali Mohammadi (“Petitioner”) and Federal Respondents Kristi Noem,
24 Todd Lyons, Thomas E. Freeley, Pamela Bondi, the Executive Office for Immigration
25 Review, and United States Immigration and Customs Enforcement (“Federal
26 Respondents”), through undersigned counsel, hereby submit this Stipulation to extend the
27 deadline for Federal Respondents to file a response to the Petition for Writ of Habeas
28 Corpus (“Petition”), ECF No. 1. This is the second request for an extension.

1 Federal Respondents' response to the Petition is currently due on January 29, 2026.
2 See ECF No. 12. Federal Respondents are continuing to obtain and review documents
3 related to Petitioner's initial detention, parole, and subsequent re-detention in order to
4 present a complete and fully informed response to the Court.

5 On January 29, 2026, Federal Respondents conferred with Petitioner's counsel
6 regarding an extension of time to respond to the Petition. Petitioner's counsel agreed to a
7 four-day extension, extending the deadline to February 3, 2026. This is the parties' second
8 request for an extension.

9 Accordingly, the parties respectfully request that the Court approve this stipulation
10 and extend the deadline for Federal Respondents to file a response to the Petition from
11 January 29, 2026, to February 3, 2026. This request is made in good faith and not for
12 purposes of delay.

13 Respectfully submitted this 29th day of January 2026.

14 CONTIGO LAW

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/s/ Summer A. Johnson
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24 **IT IS SO ORDERED:**

25 _____
26 **UNITED STATES DISTRICT JUDGE**

27 **DATED:** _____
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