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7 ATTORNEYS FOR WASHOE COUNTY  
8 SHERIFF DARIN BALAAM

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 \* \* \*

12 GUSTAVO MORA-SILVA,

Case No. 3:26-cv-00032-RFB-CLB

13 Petitioner,

**RESPONDENT SHERIFF BALAAM'S  
JOINDER TO FEDERAL  
RESPONDENTS' RESPONSE**

14 vs.

15 KRISTI NOEM, et al.,

**(ECF No. 8)**

16 Respondents. \_\_\_\_\_/

17 Respondent Darin Balaam ("Sheriff Balaam") by and through counsel, hereby  
18 submits this Joinder to Federal Respondents' Response to the Petition for Writ of Habeas  
19 Corpus and Complaint for Declaratory and Injunctive Relief (ECF No. 8).<sup>1</sup>

20 As Sheriff of the Washoe County Sheriff's Office ("WCSO"), which operates and maintains  
21 the Washoe County Jail owned by Washoe County, and pursuant to a detention services  
22 agreement with U.S. Immigration and Customs Enforcement ("ICE"), Sheriff Balaam had  
23 (and has) no independent involvement in Petitioner's immigration proceedings and no  
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25 \_\_\_\_\_  
26 <sup>1</sup> While there is no local rule specifically providing for joinders in motion practice, the  
27 courts in this district have considered and ruled on joinders to motions. *See e.g., Johnson v. Nguyen*, 2015 U.S. Dist. LEXIS 39488, \*1-2 (D. Nev. Mar. 27, 2015); *see also Peterson v. Miranda*, 2015 U.S. Dist. LEXIS 42198, \*2, 10 (D. Nev. Mar. 27, 2015).

1 independent authority to release Petitioner. Sheriff Balaam and the Washoe County Jail are  
2 required to house Petitioner in the Washoe County Jail facility unless and until directed  
3 otherwise. In line with this Court's Order to Show Cause entered January 22, 2026 (ECF  
4 No. 6, p. 3 Ins. 1-11), Petitioner will not be transferred pending these proceedings.

5 As such, Sheriff Balaam hereby joins Federal Respondents' Response to the Petition for Writ  
6 of Habeas Corpus and Complaint for Declaratory and Injunctive Relief (ECF No. 8) in full.

7 Dated this 29th day of January, 2026.

8 By /s/ Cobi Burnett  
9 COBI BURNETT  
Deputy District Attorney

10 ATTORNEYS FOR WASHOE COUNTY  
11 DEFENDANTS  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, the foregoing was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

KAREN SARAHI MONRREAL-SALAZAR  
LAW OFFICE OF KAREN S. MONRREAL

CHRISTIAN RAMSES RUIZ, GOVT  
DOJ-USAO

VIRGINIA TOMOVA, GOVT  
DOJ-USAO

SIGAL CHATTAH , GOVT  
DOJ-USAO

Dated this 29th day of January, 2026.

\_\_\_\_\_  
/s/ Elle Thomas  
Elle Thomas