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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 Israel Nunez Figueroa,  
14 Petitioner,

15 v.

16 John Mattos,

17 Respondents.

Case No. 2:26-cv-00184-RFB-MDC

**Stipulation for Extension of Time  
to file Amended Petition,  
Response, and Reply**

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19 On January 27, 2026, this Court ordered Respondent to show cause why the  
20 petition should not be granted by filing a return certifying the true cause of detention  
21 by January 30, 2026.<sup>1</sup> At the same time, this Court appointed the Federal Public  
22 Defender’s Office to represent Mr. Nunez Figueroa, and to enter an appearance on  
23 behalf of Petitioner by January 30, 2026. Undersigned counsel Laura Barrera entered  
24 her appearance for Petitioner on January 30, 2026.<sup>2</sup> In the January 27, 2026, order,  
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26 <sup>1</sup> ECF No. 4.

27 <sup>2</sup> ECF No. 6.

1 this Court also gave Petitioner up to February 2, 2026, to file an amended petition if  
2 desired.<sup>3</sup> Counsel for Petitioner agreed with the Court's assessment of the issues and  
3 did not intend to file an amended petition, however, counsel failed to note that the  
4 Federal Respondents had not been named in the petition. On February 3, 2026,  
5 counsel for Petitioner reached out to counsel for interested party the United States of  
6 America, Assistant United States Attorney Summer Johnson, and determined that  
7 no response to the order to show cause had been filed because the Federal  
8 Respondents, Petitioner's legal custodians, had not been named. Accordingly, counsel  
9 for the United States and Petitioner hereby respectfully request this Court accept the  
10 following briefing schedule and apologize for the short delay in proceedings caused by  
11 this misunderstanding.

12 Petitioner will file an amended petition by February 4, 2026. Respondents will  
13 then have until February 6, 2026, to file a response to the amended petition, and  
14 Petitioner will have until February 9, 2026, to file a reply to the response.

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16 Dated February 3, 2026.

17 Respectfully submitted,

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19 Todd Blanche  
20 Deputy Attorney General of the U.S.

Rene L. Valladares  
Federal Public Defender

21 */s/ Summer Johnson*  
22 Summer Johnson  
23 Assistant United States Attorney

*/s/ Laura Barrera*  
Laura Barrera  
Assistant Federal Public Defender

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<sup>3</sup> ECF No. 4.