

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

Ounheuan HONG,

*Petitioner,*

v.

Warden of ERO El Paso Camp East Montana,  
et al.,

*Respondents.*

Case No. 3:26-CV-00302-LS

**PETITIONER'S OPPOSITION TO RESPONDENTS'  
MOTION FOR EXTENSION OF TIME**

Petitioner Ounheuan Hong, by and through undersigned counsel, opposes Respondents' Motion for Extension of Time. Respondents have requested additional time to confer and review documents to fully respond to this petition. ECF No. 5.

In opposition, Mr. Hong states that the Court has already given Respondents twenty days to respond to his Petition—the maximum amount of time permitted by federal law. 8 U.S.C. § 2243. Respondents have cited no legal basis for an extension beyond twenty days. Moreover, given the extraordinary nature of Petitioner's detention, any further delay would only prolong unlawful confinement and exacerbate the significant harm he and his family are experiencing.

On January 18, 2026, Respondents forcibly arrested Petitioner at gunpoint in his home without a warrant, consent, or exigent circumstances, in clear violation of the Fourth Amendment. Pet'n ¶¶ 12-20; *see also* ECF No. 1-4. He was shortly thereafter transported to El Paso Camp East, Montana, in El Paso, Texas, where he remains confined, isolated, and suffering without access to clean clothing or the basic necessities of hygiene. Pet'n ¶ 24. This detention continues to violate

his constitutional rights, including protections against unreasonable seizures, and constitutes serious violations of due process and regulatory protections.

Respondents have been aware of these facts for twenty days. In light of the severe and unlawful nature of Petitioner's arrest, the ongoing lawlessness of his detention, and the profound mental anguish experienced by him and his family, an extension of time to respond is not justified. The original twenty-day period provides more than sufficient time for Respondents to answer, and any further delay would only prolong the unlawful deprivation of Petitioner's liberty.

Prompt adjudication is essential. Petitioner's constitutional rights have already been violated, and continued delay risks compounding both the legal violations and the human suffering he is enduring. The Court's existing schedule provides Respondents adequate time to respond without any further extension.

For these reasons, Petitioner respectfully requests that the Court deny Respondents' request for additional time. The twenty-day schedule is sufficient, and any extension would needlessly prolong unlawful detention and exacerbate the severe mental anguish suffered by Petitioner and his family.

Respectfully submitted this 25<sup>th</sup> day of February, 2026.

By and through his Counsel,

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2026, I electronically filed the foregoing Opposition using the Court's CM/ECF system, which will send notifications of such filing to the individuals and entities who have entered appearances in this case.

Date: February 25, 2026

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