

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

LUIS GUILLERMO AROCA ORTIZ,

Plaintiff,

v.

KRISTI NOEM, *et al.*

Defendants.

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Civil Action No. 4:25-cv-6274

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**UNOPPOSED MOTION FOR EXTENSION OF TIME**

The Defendants, by and through the undersigned counsel, in accordance with Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, move the Court for an extension of time until February 9, 2026, to file a Response to Plaintiff's Complaint. The following discussion supports this motion.

1. On December 24, 2025, the Plaintiff filed a Complaint for declaratory and injunctive relief. Plaintiff has not brought a habeas claim and is **not** seeking release from immigration custody. Dkt. 1.
2. On January 5, 2026, Defendants were ordered to Answer by January 9, 2026. Dkt. 4. However, Defendants were not served with the Court's Order until January 7, 2026.
3. Plaintiff's Complaint challenges institutional policies regarding custody determinations by Immigration Judges. Dkt. 1.

4. Granting an extension will allow time for the Defendants to coordinate a responsive pleading that addresses Plaintiff's programmatic challenges.
5. Defendants therefore request that the Court extend their responsive pleading deadline 30 days, to February 9, 2026.
6. Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure states the following:

(b) **Extending Time.**

(1) In General. When an act may or must be done within a specified time, the court may, for *good cause*, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]

Fed. R. Civ. P. 6(b)(1)(A) (emphasis added).

7. Defendants respectfully submit that they have satisfied the requirements of the foregoing rule. Defendants have filed this motion before the deadline has passed and have shown good cause. Fed. R. Civ. P. 6(b)(1) and 6(b)(1)(A). They are not seeking this extension solely for the purposes of delay. No parties will be prejudiced if this motion is granted.

Therefore, the Defendants request that the Court grant this motion and give them until February 9, 2026, to file a response to the Complaint.

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Christina Cullom  
Christina Cullom  
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Attorney for Defendants

**CERTIFICATE OF CONFERENCE**

Counsel for Defendants conferred with counsel for Plaintiff on January 7, 2026 via telephone about the relief requested in this motion. Plaintiff does not oppose this motion.

/s/ Christina Cullom  
Christina Cullom

**CERTIFICATE OF SERVICE**

I certify that on January 7, 2026, the foregoing was filed and served on counsel of record through the Court's CM/ECF system.

/s/ Christina Cullom  
Christina Cullom  
Assistant United States Attorney