

1 TODD BLANCHE
Acting Attorney General of the United States
2 SIGAL CHATTAH
First Assistant United States Attorney
3 District of Nevada
Nevada Bar Number 8264

4 TAMER B. BOTROS
Assistant United States Attorney
5 Nevada Bar No. 12183
6 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
7 Phone: (702) 388-6336
Fax: (702) 388-6787
8 Tamer.Botros@usdoj.gov
Attorneys for the Federal Respondents

10 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 ROBERTO VILLALTA MARTINEZ,

12 Petitioner,

13 v.

14 TODD BLANCHE, *et al.*,

15 Respondents.

Case No. 2:26-cv-01970-RFB-BNW

**Joint Stipulation for Extension of
Time for Federal Respondents to File
Notice Regarding Class Membership
and Detention Authority and
Responses to Interrogatories and for
Petitioner to file Amended Petition**

(First Request)

18
19 Petitioner and Federal Respondents, through undersigned counsel, hereby submit
20 this Stipulation for an extension of time for Federal Respondents to file Notice Regarding
21 Class Membership and Detention Authority and Responses to Interrogatories, extending
22 the deadline from July 7, 2026, to July 10, 2026. Further, the parties submit and stipulate
23 that Petitioner will have up to and including July 16, 2026 to file the Amended Petition for
24 Writ of Habeas Corpus. *See* Court's Order, ECF No. 4. Federal Respondents conferred
25 with Petitioner's counsel regarding an extension, and Petitioner's counsel agreed. This is
26 the first request for an extension.

27 ///

28 ///

1 Accordingly, the parties respectfully request that the Court approve this stipulation
2 and extend the deadline for Federal Respondents to file a Notice Regarding Class
3 Membership and Detention Authority and Responses to Interrogatories from July 7, 2026,
4 to July 10, 2026, and to extend the deadline for Petitioner to file the Amended Petition up
5 to and including July 16, 2026. These requests are made in good faith and not for the
6 purpose of delay.

7 Respectfully submitted this 7th day of July 2026.

8
9 Rene L. Valladares
Federal Public Defender

TODD BLANCHE
Acting Attorney General of the United States
SIGAL CHATTAH
First Assistant United States Attorney

11 /s/ Carmen Brooks
12 Carmen Brooks
Assistant Federal Public Defender
411 E. Bonneville Ave., Ste. 250
13 Las Vegas, Nevada 89101
Carmen_Brooks@fd.Org
14 Attorney for Petitioner Roberto Villalta
Martinez

/s/ Tamer B. Botros
TAMER B. BOTROS
Assistant United States Attorney

16 **IT IS SO ORDERED:**

18 **UNITED STATES DISTRICT JUDGE**

19 **DATED:** _____
20
21
22
23
24
25
26
27
28