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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

B.E. C.L. et al.,

Petitioner,

v.

RUBY HERNANDEZ, et al.,

Respondents.

Case No. 5:26-cv-07272-FWS-DTB

**PETITIONER'S OPPOSITION TO
RESPONDENTS' EX PARTE
APPLICATION FOR EXTENSION
OF TIME TO FILE ANSWER BY
THREE (3) DAYS**

1 Petitioners respectfully oppose Respondents' Motion to Extend Time to File
2 Answer to Petition for Writ of Habeas Corpus that was filed on July 2, 2026, which
3 requests that the Court extend Respondents' deadline to reply to Petitioners 'Writ by an
4 additional three days, to July 16, 2026. *See* Respondents' Ex Parte Application for
5 Extension of Time to File Answer, Dkt.14. Petitioners are unaccompanied children
6 ("UC") currently detained by Respondents in ORR-subcontracted facilities throughout
7 Southern California. Petitioners are comprised of a two-sibling set and their maternal
8 uncle (also a minor) (B.E.C.L., J.E.M.C., and A.I.L.D.) and a second set of siblings
9 (M.G.R.P. and A.I.R.P.); pending before ORR there are only two reunification
10 applications (one for each family set) therefore there are only two sets of facts and
11 timelines for ORR to respond to, not 5 individual situations.

12 Petitioners have been detained by Respondents for approximately 243 days. This
13 is so despite ORR's mandate to "promptly" place UCs in the least restrictive setting
14 possible by identifying and vetting "sponsors" for Petitioners. But instead of working
15 towards releasing these children to their sponsor (i.e., scheduling a DNA test),
16 Respondents have refused to properly progress through and adjudicate Petitioners'
17 sponsorship applications. Given the severity of the deprivation and the irreparable harm
18 to Petitioners, the Court should not reward the Government's delay with an extension of
19 time to respond to Petitioners' petition for writ of habeas corpus.

20 This Court's order was clear in the NOTICE OF GENERAL ORDER 26-05 AND
21 BRIEFING SCHEDULE, dated July 6, 2026, "Respondent shall file an answer to the
22 habeas petition no later than 7 days from the date the Clerk's Office issues this notice."
23 Dkt. 12. 7 days from the issuance of the briefing schedule is July 13, 2026. Given the
24 nature of the case—where Petitioners are seeking habeas relief because they are
25 unaccompanied child currently being held by ORR in violation of their rights-- Petitioner
26 respectfully requests that the Court deny the Government's request for an extension.¹

27 ¹ Given Respondents' July 13, 2026 deadline to respond, as well as Petitioner's substantial
28 interest in the prompt adjudication of his habeas petition, Petitioner respectfully requests

(cont'd)

1 Dated: July 13, 2026

Respectfully submitted,

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3 /s/ Cynthia Isabel Felix
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28 that any extension, if one were to be granted, be limited to no more than twenty-four
hours from the date of the Court's order on Respondents' motion.