UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

GENAURIS JOSE ARIAS LARA Petitioner, v. WARDEN, FCI-BERLIN, ET AL., Respondents.	**Case No: 1:25-CV-229-LM-AJ**

PETITIONER'S SECOND ASSENTED-TO MOTION TO AMEND PETITION

Petitioner Genauris Jose Arias Lara hereby moves this Honorable Court, with the consent of Respondents, to amend his Petition for Writ of Habeas Corpus a second time pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and Local Rule 15.1. In support therefor, Petitioner states the following:

1. On April 7, 2026, Counsel for the Parties conferred about the present motion in accordance with their obligations under Local Rule 7.1, and Respondents' Counsel offered her preliminary concurrence.
2. On April 10, 2026, Respondents' Counsel confirmed her concurrence following her review of the motion papers and proposed Second Amended Petition.
3. With this Motion, Petitioner submits his proposed Second Amended Petition, attached as **Exhibit A**.

Respectfully submitted,

GENAURIS ARIAS LARA, Petitioner,

By his attorneys,

Dated: April 10, 2026

/s/ Lindsay Kramer Custer

Lindsay Kramer Custer, MA Bar # 705259
Ricardo Jimenez Solis, MA Bar # 713248
Admitted pro hac vice
Northeast Justice Center
50 Island Street, Ste. 203B
Lawrence, MA 01840
(978) 888-0625
lkcuster@njc-ma.org

Dated: April 10, 2026

/s/ Kara Thorvaldsen

Kara Thorvaldsen, NH Bar: 275396
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Ste. 345
Boston, MA 02210
617-603-3771
kthorvaldsen@lawson-weitzen.com

CERTIFICATE OF SERVICE

I, Lindsay Kramer Custer, hereby certify that on this date I served the foregoing Motion and supporting exhibits by filing the same with the Court's ECF electronic filing system and by so doing served the Motion on all registered participants to this action, including counsel for Respondents.

Dated: April 10, 2026

/s/ Lindsay Kramer Custer