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Attorneys for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Portland Division**

L-J-P-L-, an adult,

Petitioner,

v.

CAMMILLA WAMSLEY, Seattle Field
Office Director, Immigration and Customs
Enforcement and Removal Operations
("ICE/ERO"); TODD LYONS, Acting
Director of Immigration Customs
Enforcement ("ICE"); U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT; KRISTI
NOEM, Secretary of the Department of
Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND
SECURITY; and PAMELA BONDI, Attorney
General of the United States,

Respondents.

Case No. 3:25-cv-01390-IM

Agency No. A



**PETITIONER'S MOTION FOR AN
EXTENSION OF TIME TO FILE
REPLY BRIEF**

Petitioner moves the court for an extension of time to file a reply brief until 8pm August 18, 2025. Pursuant to LR 7-1, counsel for the parties conferred in good faith by telephone conference and Respondents' counsel advises that they oppose this motion.

Respondents filed a return certifying the true cause of Petitioner's detention on August 14, 2025, and a supplemental declaration on August 15, 2025 at 10.30am. On August 15, 2025 at 3.36pm, the Court ordered Respondents to file a supplement by 2.00pm on August 18, 2025. However, currently, Petitioner's reply is due on August 18, 2025 at 12pm—prior to the Respondents' supplemental deadline. The supplement the Respondents are ordered to file will contain facts, information and argument information to which Petitioner should be able to reply as a matter of fairness and efficiency. Accordingly, Petitioner seeks a modest extension of time until 8pm to file his reply.

Dated: August 18, 2025.

/s/ Stephen W Manning

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