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Attorney for Respondents

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

O.A.M.R.,

Petitioner,

v.

MINGA WOFFORD, *et al.*,

Respondents.

No. 1:25-CV-01955 JDP HC

**REQUEST FOR 60-DAY EXTENSION OF
TIME IN WHICH TO PROPOSE BRIEFING
SCHEDULE; PROPOSED ALTERNATIVE
BRIEFING SCHEDULE**

Respondents have complied with the release order in this case and petitioner is no longer in immigration detention.

Respondents are in receipt of this Court's order to meet and confer and file a joint briefing schedule, but respectfully request a 60-day deadline to comply with that order. The purpose of this lengthy delay is to allow Respondents time to present informed briefing in a rapidly-evolving area of the law, where appeals are currently pending in the Ninth Circuit that are likely to have precedential effect on current immigration habeas litigation, including this case.

Respondent's position is that Petitioner will not be prejudiced because he has been released from detention and returned to the status quo.

Petitioner, per Petitioner's counsel, opposes this request on the grounds that Petitioner needs finality regarding his liberty interest.

If the Court denies Respondent's request for a 60-day delay, Respondents propose the Court set Respondents' response to the petition as due in one week with Petitioner's reply, if any, due a week after

1 that.

2 Dated: February 3, 2026

Respectfully submitted,

3 ERIC GRANT
4 United States Attorney

5 /s/ Nicholas M. Fogg
6 NICHOLAS M. FOGG
7 Assistant United States Attorney
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