BXD

February 26, 2026

By ECF

Hon. Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Martinez de la Cruz v. Russo et al.*, 26-cv-629 (HG)

Dear Judge Gonzalez:

I represent the Petitioner in the above-referenced habeas petition. Petitioner's deadline to file his first amended petition was February 25, 2026. I filed the petition at 4:16am, 4 hours and 16 minutes after the deadline. I write respectfully to request that the Court grant Petitioner a *nunc pro tunc* extension of his deadline to file the amended petition such that the amended petition is deemed timely filed. Counsel for Respondents consents to this request. Due to unexpected work demands, I could not file the amended petition before the 11:59 p.m. deadline.

I apologize to the Court and Respondents for the short delay in the filing of the amended petition, and I thank the Court for its consideration of this request.

Respectfully,

/s/ Anne Mathews
Anne Mathews
Immigration Practice
The Bronx Defenders
Counsel for Petitioner

cc: Counsel of Record (by ECF)