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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (LAS VEGAS)**

Antonio SANTOS GODINEZ

Petitioner,

vs.

Kristi NOEM, Acting Secretary of the
United States Department of Homeland
Security;

Pamela BONDI, Attorney General of the
United States;

Jason KNIGHT, Salt Lake City Acting Field
Office Director, Enforcement and Removal
Operations, U.S. Immigration and Customs
Enforcement;

Frank D'AMICO, Corrections Captain at
Henderson Detention Center.

Respondents.

Case No.: 2:26-cv-00362-RFB-BNW

Agency 

**OPPOSITION TO FEDERAL
RESPONDENT'S MOTION FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO ORDER TO SHOW
CAUSE (ECF No. 9)**

Opposition To Federal Respondent's Motion for Extension of Time to File a Response to Order
to Show Cause (ECF No. 9)

1 Federal Respondents have requested an extension of time to respond to Petitioner's
2 Emergency Motion for Temporary Restraining Order, which is due today, February 18, 2026.
3 Respondents contend that additional time is necessary because they are still reviewing and
4 gathering information regarding Petitioner. *See* Federal Respondents' Motion for Extension of
5 Time to File a Response to Order to Show Cause, ECF 9. Respondents further assert that
6 government counsel has been engaged in hearings in eight other immigration matters on February
7 18, 2026, is preparing responses in several other cases before this Court, has scheduled leave at
8 the end of the week, and that the office has recently received over thirty immigration habeas
9 petitions requiring expedited responses. *Id.* at 1. They also state that the Civil Division of the
10 United States Attorney's Office for the District of Nevada is not operating at full capacity. *Id.* at
11 2.

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14 However, as set forth below, Respondents have failed to demonstrate good cause, as
15 required under Fed. R. Civ. P. (6)(b)(1)(A) and Local Rule IA 6-1(a) of this Court.

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17 Fed. R. Civ. P. (6)(b)(1)(A) permits this Court to extend time limits only upon a showing
18 of "good cause." Similarly, Local Rule IA-6-1(a) requires a demonstration of good cause for any
19 extension of time. Respondents have failed to meet this standard for the following reasons: 1)
20 Respondents have had sufficient time to respond 2) the legal issues are nearly identical to dozens
21 of Writs of Habeas Corpus Petitions which are very familiar to the Respondents and 3) Petitioner
22 continues to suffer irreparable harm.
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1 Respondents have had five full days since the Order to Show Cause was issued to prepare
2 their response. This constitutes ample time to submit a response given that the legal arguments at
3 issue in this case have been extensively briefed in similar cases nationwide, including in at least
4 sixty cases in this Court. Respondents are therefore already familiar with the relevant legal issues
5 and arguments, further undermining their claim of needing additional time. Perhaps more
6 important, Petitioner remains detained. Every day that Petitioner remains in detention constitutes
7 an ongoing and irreparable harm. The purpose of a TRO is to provide immediate relief in situations
8 where irreparable harm is occurring. Fed. R. Civ. P. 65(b). Extending the TRO would prolong this
9 harm without justification.
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12 Given the urgent nature of TRO proceedings, extensions should be granted only in
13 exceptional circumstances where good cause is clearly demonstrated. Respondents have failed to
14 meet this high standard.
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16 For the foregoing reasons, Respondents have failed to demonstrate good cause for an
17 extension of time to respond to the TRO. They have had sufficient time to prepare a response, are
18 familiar with the legal issues, and any extension would cause continued irreparable harm to
19 Petitioner who remains in detention.
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21 Dated: February 18, 2026

22 /S/ Sylvia L. Esparza
23 Sylvia L. Esparza, Esq.
24 Attorney for Petitioner
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