

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

DAWIT ABRAHAM MEKONNEN,

Case No. 1:26-cv-00122-AGF

Petitioner,

v.

GARY STOLZER, Warden of Stc. Genevieve County Jail,
Respondent.

**PETITIONER'S NOTICE REGARDING REPLY AND POSITION ON HEARING,
AND REQUEST FOR LEAVE TO FILE REPLY BY JUNE 17, 2026**

Pursuant to paragraph 3 of this Court's Case Management Order dated June 1, 2026 (ECF No. 4), and 28 U.S.C. § 2243, Petitioner Dawit Abraham Mekonnen respectfully submits this notice regarding his intention to file a reply and his position on the need for a hearing, and requests leave to file his reply on or before June 17, 2026.

1. Respondent filed its Response Brief on June 12, 2026 (ECF No. 7). Under paragraph 3 of the Court's June 1, 2026, Order, Petitioner must file this notice within three days of that response.
2. Petitioner will file a reply. The Response raises several substantial legal issues, including the application of *Herrera Avila v. Bondi*, the scope of *Banyee v. Garland*, the effect of Petitioner's pending VAWA self-petition on the detention analysis, and the confidentiality protections of 8 U.S.C. § 1367. A reply will assist the Court in resolving these issues.
3. Petitioner respectfully requests leave to file his reply on or before June 17, 2026. The additional time is needed to address the legal authorities raised in the Response, to verify

intervening authority, including the status of the appeal in Lugo-Solet v. Mullin and developments in related class litigation, and to prepare supporting materials. This brief request will not delay the proceedings or prejudice any party. Respondent remains enjoined from removing or transferring Petitioner from this District under the Court's June 1, 2026 Order, so the short extension preserves rather than alters the status quo.

For these reasons, Petitioner respectfully requests that the Court permit Petitioner to file his reply on or before June 17, 2026.

Respectfully submitted,

/s/Abeba Attles
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Counsel for Petitioner,
Dawit Abraham Mekonnen

Dated: June 14, 2026

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2026, a true and correct copy of the foregoing was filed with the Court via the CM/ECF system, which will serve all counsel of record, including Shane K. Blank, Assistant United States Attorney, 111 South Tenth Street, Room 20.333, Saint Louis, Missouri 63102.

/s/Abeba Attles
Abeba Attles, Esq.