United States Department of Justice

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October 13, 2026

VIA CM/ECF
Hon. Anthony J. Brindisi
U.S. District Judge
Alexander Pirnie Federal Bldg. and U.S. Courthouse
10 Broad Street
Utica, NY 13501

RE: *Reyes Diaz v. Sukmanowski, et al*
Civil Action No. 9:26-cv-01859 (AJB)

Dear Judge Brindisi:

I write on behalf of Respondents to respectfully request, on consent, a 7-day extension of time, until October 21, 2026, to file their response to Petitioner's Petition for Writ of Habeas Corpus. Respondents' current deadline is October 14, 2026, and this is Respondents' first request for an extension.

Petitioner filed this action on September 30, 2026, seeking a Writ of Habeas Corpus, and affirmatively states that he is not in the physical custody of U.S. Immigration and Customs Enforcement ("ICE") and is not presently detained in any facility operated or controlled by the Department of Homeland Security ("DHS"). *See* Dkt. 1. On October 1, 2026, the Court issued a Text Order setting Respondents' response deadline for October 14, 2026. *See* Dkt. 2. Due to a sudden illness, undersigned counsel is unable to meet this deadline despite due diligence. Counsel anticipates being able to fulfill all obligations by October 21, 2026.

I have conferred with Petitioner's counsel, who consents to this extension request.

Respectfully submitted,

TODD BLANCHE
Attorney General

JOHN A. SARCONE III
First Assistant United States Attorney

By: *s/ Alexis M. Osborne*
Alexis M. Osborne
Assistant United States Attorney
Bar Roll No. 707475

cc: Counsel of record (via CM/ECF)