IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

L.G.M.L., *et al.*, Plaintiffs, v. NOEM, *et al.* Defendants.	Case No. 1:25-cv-02942 **PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR ONE-DAY EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION FOR CLASS**

After Defendants' unlawful attempt to remove unaccompanied children originally hailing from Guatemala was stopped by a temporary restraining order that was litigated over a holiday weekend, the Court set a briefing schedule on Plaintiffs' pending Motion to Certify Class (ECF No. 6). Under that schedule, Defendants' opposition to Plaintiffs' Motion is due on September 5, 2025.

On September 4, at 3:53 pm, counsel for Defendants contacted Plaintiffs' counsel by email requesting consent to a one-day extension of time. In response, Plaintiffs' counsel stated that "We are inclined to consent to your extension request, premised on a commensurate extension for the replies to preserve our allotted time. We have become concerned, however, about reports that the administration may be planning events mirroring those of last weekend but targeting other unaccompanied children. We are hoping to avoid the necessity of another quick-turn weekend TRO. We believe the briefing schedule would, at minimum, need to be adjusted were such events to unfold. We request that you confirm that your clients do not plan to imminently seek to deport or repatriate unaccompanied children, of other-than Guatemalan

nationality, in the custody of ORR during the pendency of the weekend. With that modest agreement in place, we will agree to your request." Defendants refused to consent to that modest request.

Plaintiffs then requested that Defendants include the following statement in their motion seeking the extension for the Court's awareness: "In response to concerns that the government may imminently seek to remove unaccompanied children of other nationalities, Plaintiffs asked the government to agree that it will not seek to effectuate removals of such children over the course of the coming weekend, because any such actions would necessitate renewed TRO briefing. The government refused that request, and Plaintiffs are unable to consent to the requested extension in light of the possibility of further emergency proceedings this weekend." Defendants also refused to include Plaintiffs' statement. The email correspondence is attached in full as Exhibit A.

As a result, Plaintiffs file this opposition to Defendants' motion for the extension in order to advise the Court of the basis for Plaintiffs' objection. Should Defendants once again attempt to remove unaccompanied minors in violation of law and without due process, Plaintiffs plan to seek immediate additional relief.

Dated: September 4, 2025

Respectfully submitted,

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**Pro Hac Vice application forthcoming*
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