



U.S. Department of Justice

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January 14, 2026

**By ECF**

Hon. Katharine S. Hayden, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Frank R. Lautenberg Post Office & U.S. Courthouse  
2 Federal Square, Courtroom 5  
Newark, NJ 07101

**Re: *Student Does 1-6 v. Noem et al.*, Civ. No. 25-02998  
Request for Further Extension to Respond to Class  
Certification Motion**

Dear Judge Hayden:

This Office represents federal officials from the Department of Homeland Security sued in their official capacities (collectively, “DHS”) under the Administrative Procedure Act (“APA”). We write with the consent of Plaintiffs to respectfully request an additional three-week extension for Respondents’ brief in opposition to Plaintiff’s motion to certify a class. If granted, the brief will be due on **February 5, 2026**.

We respectfully suggest that good cause exists for this proposed extension. As the Court is aware, this Office continues to handle an unprecedented volume of emergent immigration habeas petitions, which we continue to prioritize because of the liberty interests at issue. Further, this Office has been working with DHS on some follow-up discovery questions in this case posed by Plaintiffs and have wanted to prioritize that in case it could narrow the scope of the lawsuit going forward.

If the Court is willing to grant this application, we respectfully request that Your Honor “So Order” this letter and submit it to the Clerk for docketing.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

TODD BLANCHE  
U.S. Deputy Attorney General

JORDAN FOX  
Chief of Staff & Associate Deputy  
Attorney General  
Special Attorney

By: /s/ John T. Stinson  
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cc: All counsel of record (by ECF)