

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

HAITIAN AMERICANS UNITED INC.;  
VENEZUELAN ASSOCIATION OF  
MASSACHUSETTS; UNDOCUBLACK  
NETWORK, INC.; SYDNEY DOE; MARLENE  
DOE; GUSTAVO DOE; and NATALIA DOE,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; U.S. DEPARTMENT  
HOMELAND SECURITY; and KRISTI NOEM, in  
her official capacity as Secretary of the Department  
of Homeland Security,

Defendants.

Civil Action No. 25-cv-10498(RGS)

**PLAINTIFFS' RESPONSE TO DEFENDANTS' NOTICE (ECF NO. 84)**

Plaintiffs Haitian Americans United, Inc. ("HAU"), Venezuelan Association of Massachusetts ("VAM"), UndocuBlack Network Inc. ("UBN") and the four individual Plaintiffs respectfully submit this response to Defendants' Notice filed earlier today, ECF No. 84, because Defendants misstate the applicable deadline for their Reply. Although Defendants assert that their Reply is due December 26, 2025, in fact it was due yesterday, a deadline Defendants have missed.

On July 28, 2025, the Court set a briefing schedule for Plaintiffs' Motion for Partial Summary Judgment and Defendants' Motion to Dismiss, with Defendants' Reply in Support of their Motion to Dismiss due October 3, 2025. ECF No. 56.

On October 1, 2025 (two days before their Reply was due), Defendants moved to stay proceedings due to the lapse in federal appropriations. ECF No. 82. They requested that all

deadlines be extended “commensurate with the duration of the lapse in appropriations—i.e., each deadline would be extended by the total number of days of the lapse in appropriations.” *Id.* at 2.

On October 2, 2025, the Court granted Defendants’ motion in part, stating that the deadlines in ECF No. 56 were stayed “until Congress appropriates funds for the Department of Justice.” ECF No. 83. The Court ordered that upon the lifting of the stay, “these deadlines will automatically be extended commensurate with the duration of the lapse in appropriations.” *Id.*

Federal appropriations were restored on November 12, 2025, ending a 43-day lapse. Under the automatic extension granted by the Court’s Order, Defendants’ Reply deadline was therefore extended 43 days from its original due date of October 3, 2025—*i.e.* to **November 17, 2025**.<sup>1</sup>

Dated: November 18, 2025

Respectfully submitted,

/s/ Mirian Albert

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<sup>1</sup> 43 days from October 3, 2025 is November 15, 2025. As that day is a Saturday, the applicable deadline is November 17, 2025. Fed. R. Civ. Proc. 26(a)(1)(C).

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2025, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/Mirian Albert  
Mirian Albert (BBO #710093)