

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JEANFRANCO ALEJANDRO FLORES)
SALAZAR,)

Case No: 1:25-CV-11159-LTS

Petitioner,)

v.)

ANTONE MONIZ, Superintendent,)
Plymouth County Correctional Facility,)

Respondent.)

JOINT STATUS REPORT

Petitioner Jeanfranco Alejandro Flores Salazar and Respondent Antone Moniz (collectively “the Parties”) in the above-captioned petition hereby submit this joint status report in response to the Court’s electronic order entered July 11, 2025, at Doc. 34.

Procedural Background

1. Petitioner filed the above-captioned petition for writ of habeas corpus (“Petition”) on April 29, 2025. *See* Doc. 1.
2. On May 16, 2025, Respondent filed a Motion to Dismiss the Petition as Moot, at Doc. 15, and on May 23, 2025, Respondent filed a response to the Court’s Order, at Doc. 14, explaining the basis for Petitioner’s custody. *See* Doc. 16.
3. This Court held an evidentiary hearing on Respondent’s Motion to Dismiss and on the merits of the Petition on June 9, 2025. *See* Doc. 24.
4. On June 11, 2025, this Court entered a written order denying the Respondent’s Motion to Dismiss, allowing the Petition, and ordering Petitioner’s release from custody. *See* Doc. 26.
5. By that same order, the Court further ordered Respondent to show cause by June 23, 2025, why Petitioner should not be entitled to fees under the Equal Access to Justice Act. *See id.*

6. Respondent filed its show-cause response on June 23, 2025, at Doc. 29, and Petitioner filed his itemization of fees and costs and his response to Respondent's show-cause filing on July 3, 2025, at Doc. 32.

7. On July 10, 2025, the Parties filed a Joint Motion to Stay the litigation for 30 days to facilitate possible settlement of Petitioner's requested fees and costs.

Current Status

The Parties have tentatively agreed to the terms of a settlement of Petitioner's requested fees and costs, subject to further government approvals, but they have yet to memorialize that agreement. The Parties therefore request that the litigation remain stayed an additional 30 days from today to August 29, 2025, to permit the Parties time to memorialize a final agreement.

Should the Parties be unable to reach such an agreement, the Government will not be offering any further reply to the Petitioner's fee application and the Court may proceed to rule on the papers already docketed concerning the fee award requested.

Respectfully submitted,

This 30th day of July, 2025

JEANFRANCO ALEJANDRO
FLORES SALAZAR,
Petitioner,

LEAH B. FOLEY
United States Attorney, for Respondent

By his attorneys,
Northeast Justice Center

By,

/s/ Lindsay Kramer Custer

/s/ Rayford A. Farquhar

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CERTIFICATE OF SERVICE

I, Lindsay Kramer Custer, hereby certify that I this date served the foregoing Joint Status Report through the Court's CM/ECF electronic filing system and by so doing served a copy of the same on all registered participants to this action.

Dated: July 30, 2025

/s/ Lindsay Kramer Custer
