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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OUSMANE SAVANE,

Petitioner,

v.

LADEON FRANCIS, *et al.*,

Respondents,

No. 25-cv-6666 (GHW)

STIPULATION AND ORDER CONCERNING ATTORNEY'S FEES UNDER THE EQUAL ACCESS TO JUSTICE ACT

WHEREAS, on August 18, 2025, Petitioner filed an amended petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241, Dkt. No. 8;

WHEREAS, following briefing on the habeas petition, the Court issued a Memorandum Opinion & Order on September 28, 2025, granting the petition and ordering that Respondents (collectively, the "Government") release Petitioner from custody within one day of the Order, Dkt. No. 23;

WHEREAS, judgment was entered on September 30, 2025, Dkt. No. 24;

WHEREAS, on December 27, 2025, Petitioner's counsel filed a timely motion for attorneys' fees and costs pursuant to the Equal Access to Justice Act ("EAJA"), 28 U.S.C. § 2412, Dkt. No. 28; and

WHEREAS, the parties wish to resolve Petitioner's claim for attorneys' fees and costs consensually and dispose of this matter without further litigation,

NOW, THEREFORE, it is hereby STIPULATED, AGREED, and ORDERED as follows:

1. Petitioner agrees to accept payment of thirteen thousand dollars ($13,000.00) for attorneys' fees under the EAJA as settlement of his claim for attorneys' fees and costs in this action.

2. The Government agrees to pay Petitioner's attorneys' fees and costs in this action in the amount of thirteen thousand dollars ($13,000.00) and to make such payment within 30 days after the Court endorses this Stipulation and Order.

3. Petitioner agrees that payment of thirteen thousand dollars ($13,000.00) will dispose of all EAJA claims that have been raised, or could have been raised, against the Government in this habeas action.

4. Petitioner agrees to waive his right to payment of attorneys' fees and costs in this action, so that they may be paid directly to his counsel.

5. Nothing herein shall constitute an admission by the Government that Petitioner is entitled to EAJA fees and costs in this action.

6. This Stipulation and Order contains the entire agreement between the parties and may be executed in counterparts each of which shall be deemed to be one and the same.

[*remainder of page intentionally left blank*]

Dated: New York, New York
May __, 2026

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Pro Bono Attorneys for Petitioner

Dated: New York, New York
May 15, 2026

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UNITED STATES ATTORNEY

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SO ORDERED.
Dated: May 18, 2026

HON. GREGORY H. WOODS
UNITED STATES DISTRICT JUDGE