

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JOSE DUARTE ESCOBAR,

Petitioner,

v.

PAUL PERRY, *et al.*,

Respondents.

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Case No: 3:25-cv-758

PETITIONER'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Petitioner Jose Duarte Escobar, by counsel, hereby respectfully files this motion for summary judgment on his Amended Petition, ECF No. 9, for the reasons stated in the memorandum of law filed contemporaneously herewith. This motion with the memorandum of law is timely filed pursuant to this Court's order. ECF No. 14.

Date: October 20, 2025

Respectfully Submitted,

/s/ Katherine Soltis
KATHERINE SOLTIS
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Certificate of Service

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, as well as all attachments thereto, to this Court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to counsel of record for the respondents. Additionally, pursuant to Fed. R. Civ. Pro. 5, on October 20, 2025, I mailed the foregoing by certified mail to the attorney for all respondents at:

Pursuant to Fed. R. Civ. Pro. 5, on October 20, 2025, I mailed the foregoing by certified mail to the attorney for all respondents at:

Jonathan H. Hambrick
Attorney for the Respondents
Office of the United States Attorney
919 East Main Street, Suite 1900
Richmond, Virginia 23219

Date: October 20, 2025

Respectfully Submitted,

/s/ Katherine Soltis
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