IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NARESH KUMAR, *Petitioner,* v. **BRIAN McSHANE, *et al.*,** *Defendants.*	Civil Action No. 2:25-cv-6238

JOINT REQUEST TO ALLOW PETITIONER'S TRANSFER

On this 26th day of February, 2026, all Parties jointly request this Court lift its Order preventing the Federal Respondents from moving Petitioner Kumar from the Eastern District of Pennsylvania (ECF Nos. 11, 18), in order to allow Petitioner's transfer from the Federal Detention Center – Philadelphia to the Moshannon Valley Processing Center, so that his scheduled removal proceedings may proceed. Petitioner is currently scheduled for an Individual "Merits" Hearing on his case on March 11, 2026.

Pursuant to Local Rule 5.1.2, counsel for the parties consent to the submission of this joint update with their electronic signatures below.

Dated: February 26, 2026

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Brendan M. Ryan
BRENDAN M. RYAN
Global Immigration Legal Team, LLC
150 Strafford Avenue, Suite 115
Wayne, PA 19087
(610) 975-4599
Brendan@giltlaw.com
Counsel for Petitioner

/s/ Gerald B. Sullivan
GERALD B. SULLIVAN
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
(215) 861-8786
Gerald.Sullivan@usdoj.gov
Counsel for Respondents