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

SEGUNDO HERNAN SALINAS JAIGUA,	:	
Petitioner	:	
	:	Civ. No: 25-7115-KBH
v.	:	
J.L. JAMISON, ET AL.,	:	
Respondents.	:	

Second Stipulation Extending the Time for the Government to Respond to the Motion for Attorney Fees

Petitioner Segunda Hernan Salinas Jaigua and Respondents (together "the Government"), stipulate as follows:

1. On March 24, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* ECF 9.

2. On April 14, 2026, the parties agreed to a response deadline of April 28, 2026. *See* ECF 11.

3. The Government's current deadline to respond to the motion is therefore April 28, 2026.

4. On April 23, 2026, the parties agreed that the Respondents' time to respond to the motion shall be enlarged in deference to the pending appeals in the Third Circuit in *Lopes De Andrade v. Director Philadelphia Field Office Immigration and Customs Enforcement, et al.*, No. 26-1454 (3d Cir.), and *Buele Morocho v. Warden Philadelphia FDC, et al.*, No. 26-1150 (3d Cir). The Third Circuit scheduled the matters for disposition by the Court during the week of May 11, 2026.

5. The parties believe that the Third Circuit's decision will provide additional clarity to the question whether Respondent's position was substantially justified.

6. The parties stipulate that the Respondents' time to respond to the motion shall be extended to June 30, 2026.

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

So stipulated,

Dated: April 28, 2026

LAW OFFICE OF JOSE C. CAMPOS

/s/ *Jose Campos*
JOSE C. CAMPOS
251 E. Broad St.
Bethlehem, PA 18018
Jc@jccamposlaw.com
610-868-2230

Attorney for Petitioner

DAVID METCALF
United States Attorney

/s/ *Anthony St. Joseph*
ANTHONY ST. JOSEPH
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
Anthony.stjoseph@usdoj.gov
215-861-8267

Counsel for Respondents

SO ORDERED:

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HODGE, KELLEY B., J.

Date: