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

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| GLIBERSON GRAMAJO DE LEON<br><br>*Petitioner*,<br><br>v.<br><br>J. L. JAMISON, *in his official capacity as Warden, Federal Detention Center, Philadelphia, et al,*<br><br>*Respondents*. | Civil Action No. 25-cv-07199-KSM |

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

Petitioner Gramajo De Leon and Respondents, stipulate as follows:

1. On March 23, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* ECF 10.

2. On April 16, 2026 Judge Marston ordered respondents file a responsive pleading to the motion for attorney fees by April 24, 2026. *See* ECF 11.

3. On April 22, 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.

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

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

6. 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 23, 2026

LAW OFFICE OF JOSE C. CAMPOS

*/s/ Jose Campos*
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*Counsel for Respondents*

SO ORDERED:

HONORABLE KAREN SPENCER MARSTON
*Judge, United States District Court*

Date: