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

SALVADOR BETETA RAMIREZ,

Petitioner,

v.

J.L. JAMISON, Warden of Federal Detention Center, Philadelphia; BRIAN MCSHANE, Acting Philadelphia Field Office Director, United States Immigration and Customs Enforcement; TODD LYONS, Acting Director of Immigration and Customs Enforcement; KRISTI NOEM, Secretary of the Department of Homeland Security; PAMELA BONDI, Attorney General of the United States,

Respondents.

CIVIL ACTION

Case No. 2:25-cv-7316

STIPULATION EXTENDING THE TIME FOR THE GOVERNMENT TO RESPOND TO THE MOTION FOR ATTORNEY FEES

Petitioner Salvador Beteta Ramirez and Respondents stipulate as follows:

1. On April 2, 2026, Petitioner filed a Motion for Attorney's fees (ECF No. 9) under the Equal Access to Justice Act.

2. On or around April 2, 2026, the parties agreed that Respondents' time to respond to the motion shall be enlarged to April 30, 2026.

3. 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.

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

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Counsel for Respondents

BY THE COURT

Dated: _____

_____
JOHN F MURPHY
United States District Court Judge