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

JOSE CRUZ CASTRO	:	
	:	
Plaintiffs,	:	Civil Action No. 25-cv-7333
	:	
v.	:	
	:	
J. L. JAMISON, *et al.*	:	
	:	
Respondents.	:	

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

Petitioner Jose Cruz Castro and Respondents (together "the Government"), stipulate as follows:

1. On March 31, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* ECF 10.

2. On April 15, 2026, the parties agreed to a response deadline of April 30, 2026. *See* ECF 12.

3. The Government's current deadline to respond to the motion is therefore April 30, 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 of 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

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Counsel for Respondents

SO ORDERED:

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HONORABLE JOHN M. YOUNGE
Judge, United States District Court

Date: