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

ALEXANDER CRUZ DIAZ *Petitioner,* v. J. L. JAMISON, *in his official capacity as Warden of Federal Detention Center, Philadelphia, et al.* *Respondents.*	: : : : : : : : : :	Civil Action No. 26-cv-00010-TJS

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

Petitioner Alexander Cruz Diaz and Respondents (together "the Government"), stipulate as follows:

1. On April 3, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* ECF 7.

2. On April 15, 2026, the parties agreed to a response deadline of May 1, 2026. *See* ECF 8.

3. The Government's current deadline to respond to the motion is therefore May 1, 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

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/ *Neelima Vanguri*
NEELIMA VANGURI
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
neelima.vanguri@usdoj.gov
215-861-8334

Counsel for Respondents

SO ORDERED:

_____

HONORABLE TIMOTHY J. SAVAGE
Judge, United States District Court

Date: