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

GABRIEL ENRIQUE LEAL ESTEIRA, *Petitioner*, v. J. L. JAMISON, *et al*, *Respondents*.	Civil Action No. 2:26-cv-00231-WB

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

Petitioner Gabriel Enrique Leal Esteira and Respondents, stipulate as follows:

1. On April 21, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* Dkt 11.

2. The parties agree that the Respondents' time to respond to the motion should 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 has scheduled the matters for disposition by the Court during the week of May 11, 2026.

3. The parties believe that the Third Circuit's decision will provide additional clarity to the question of whether Respondent's position was "substantially justified" within the meaning of 28 U.S.C. § 2412(d)(1)(A).

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

So stipulated,

Dated: April 30, 2026

LAW OFFICE OF JOSE C. CAMPOS

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

Attorney for Plaintiff

DAVID METCALF
United States Attorney

/s/ *John W. Scott*
JOHN W. SCOTT
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
John.scott@usdoj.gov
215-861-8359

Counsel for Respondents

SO ORDERED:

_____
HONORABLE WENDY BEETLESTONE
Chief Judge, United States District Court
Eastern District of Pennsylvania

Date: