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

JOSE URBINA-VERGARA,

Petitioner,

v.

J.L. JAMISON, *et al.*,

Respondents.

Case No. 2:26-cv-401

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

Petitioner Jose Urbina-Vergara and Respondents, stipulate as follows:

1. On May 6, 2026, Petitioner filed a motion for attorney fees under the Equal Access to Justice Act. *See* ECF 10.

2. On May 18, 2026, the parties agreed 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 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: May 18, 2026

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Attorney for Respondents

SO ORDERED:

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HONORABLE NITZA I. QUINONES ALEJANDRO
United States District Judge, Senior

Date: