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

WILMER REYNALDO XOL TZI,	:	
	:	
Petitioner	:	
v.	:	Civ No: 26-0414
	:	
J.L. JAMISON, ET AL.,	:	
	:	
Respondents.	:	

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

Petitioner Fermin Anthonio Ramos Rodriguez and Respondents hereby stipulate as follows:

1. On April 28, 2026, Petitioner filed a motion for attorney's fees under the Equal Access to Justice Act. (ECF No. 8).

2. On April 29, 2026, the parties agreed that 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.

3. The parties believe that the Third Circuit's decision will provide additional clarity to the question whether Respondents' position was substantially justified.

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

5. 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 29, 2026

LAW OFFICE OF JOSE C. CAMPOS

/s/ Jose Campos
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Counsel for Respondents

SO ORDERED:

GAIL A. WEILHEIMER
United States District Judge

Date: