UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

G.B.T., *Petitioner*, v. JOHN RIFE, et al., *Respondents*.	Case No. 2:26-cv-01842 Judge John M. Younge

PETITIONERS' REPLY WITHDRAWING MOTION TO SET CONSOLIDATED BRIEFING SCHEDULE

Petitioner respectfully withdraws his motion (ECF No. 12) to set a consolidated briefing schedule. In his combined Petition for a Writ of Habeas Corpus and Complaint (ECF No. 1), Petitioner G.B.T. seeks release from his ongoing unlawful supervision and vacatur under the Administrative Procedure Act (APA) of the policy of the ICE Field Office that imposed it (the "Philadelphia ICE surveillance policy"). Because the legal and factual issues under both causes of action are substantially intertwined, Petitioner filed a Motion for a Consolidated Briefing Schedule (ECF No. 12) to support judicial economy and efficiency. But since the date of that filing, Respondents' have submitted their Opposition to Petitioner's habeas claims (ECF No. 13) and Petitioner has submitted his Reply (ECF No. 17). Thus, Petitioner's habeas claims (Counts I-IV) are now fully briefed before this Court, eliminating the need for consolidated briefing in this case.

With regard to Petitioner's remaining claims challenging the Philadelphia ICE surveillance policy to which he is still subject (Claims V-VII), because the policy is causing Petitioner irreparable harm, he intends to move for interim relief under the APA. *See* 5 U.S.C. § 705 (authorizing district courts to issue a stay of agency action "to preserve status or rights pending

conclusion of the review proceedings"). Petitioner's motion for a stay of the Philadelphia ICE surveillance policy is forthcoming.

Dated: April 15, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed Petitioners' Reply Withdrawing Motion to Set Consolidated Briefing Schedule using the CM/ECF system. I will furthermore send a courtesy copy via email to the office of the United States Attorney for the Eastern District of Pennsylvania.

DATED: April 15, 2026

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