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

QUAN, Cuong Bao	:	
	:	
Petitioner,	:	
	:	
v.	:	Case No. 2:26-2036
	:	
JAMISON, J.L. *et al.*	:	
	:	
Respondents.	:	

STIPULATED PROTECTIVE ORDER

Petitioner Cuong Bao Quan and Respondents (the "Parties"), by and through their undersigned counsel, hereby agree and stipulate that they will be bound by the terms and conditions of this Stipulated Protective Order, covering disclosure and handling of certain protected information as set forth below:

1. On March 27, 2026, Petitioner filed a Petition for a Writ of Habeas Corpus in connection with his detention by Immigration and Customs Enforcement (ICE) following the revocation of his Order of Supervision. ECF No. 1.
2. Respondents filed their Opposition on April 23, 2026, ECF No. 6, noting in that Opposition their intent to file a certain program related record of the Department of Homeland Security, Immigration and Customs Enforcement (ICE). The record is marked by DHS, ICE "for internal use only" given it contains non-public protected information that is For Official Use Only (FOUO) and that is law enforcement sensitive (LES).
3. The Parties agree that this document and the information contained therein shall be held in strict confidentiality and may be used solely for

purposes of this litigation. To that end, the Parties agree that neither Petitioner nor his attorneys will share, copy, forward, transmit, or otherwise distribute this document, or materially discuss its contents with anyone.

4. The Parties shall make all reasonable efforts to not unnecessarily duplicate the document subject to this Order.
5. Any person who has access to this document (a) shall be informed that it is confidential and subject to non-disclosure, and (b) must agree to be bound by this Order's terms.
6. Upon conclusion of this action (including appeals), all copies of this document shall be returned to Respondents' counsel or destroyed by Petitioner's attorneys.
7. The designation of confidential information in this document shall be made by placing or affixing on the document, in a manner which will not interfere with its legibility, the word "CONFIDENTIAL."
8. Should either party intend to use this document in a manner in which it may become public record (for example, in a court filing), the party shall redact all personally identifiable information from the document, as mandated by Local Rule 5.1.3 of the United States District Court for the Eastern District of Pennsylvania.

9. The Court retains the right to allow disclosure of any subject covered by this stipulation or to modify this stipulation at any time in the interest of justice.

10. Pursuant to Local Rule 5.1.2, counsel for the Parties consent to the submission of this stipulation with their electronic signatures below.

AGREED AND STIPULATED TO:

Date: May 5, 2026

/s/ Michael Geoffino, Esq.
Michael Geoffino, Esq.
DEFENDER ASSOCIATION OF PHILADELPHIA
1441 Sansom St.
Philadelphia, PA 19102
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Counsel for Petitioner

Date: May 5, 2026

DAVID METCALF
U.S. Attorney

/s/ Lauren DeBruicker
Lauren DeBruicker
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Lauren.DeBruicker@usdoj.gov

Counsel for Respondents

APPROVED BY THE COURT:

HONORABLE JOEL H. SLOMSKY
United States District Court
Eastern District of Pennsylvania

DATED:

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true and correct copy of the foregoing stipulation and proposed order, which has been electronically filed and is available for viewing and downloading from the Court's ECF system, to be served upon all parties of record.

Dated: May 5, 2026

/s/Lauren DeBruicker
LAUREN DeBRUICKER
Assistant United States Attorney