

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

<hr/> RAWLE GERARD SUITE	:	
	:	
v.	:	CIVIL NO. 25-2613
	:	
CHRISTOPHER J. LAROSE, et al.	:	
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JOINT STATUS REPORT

Petitioner and Respondents respectfully file this joint status report in accordance with the Court’s Order of August 27, 2025.

1. On or about May 19, 2025,¹ Petitioner Rawle Gerard Suite filed a pro se petition under 28 U.S.C. § 2241 challenging his continued detention in immigration custody without a bond hearing. ECF 1. At the time of this filing, Mr. Suite was being held at the Philadelphia Federal Detention Center (“FDC Philadelphia”).

2. On July 23, 2025, Mr. Suite was transferred from FDC Philadelphia to the Moshannon Valley Processing Center (“Moshannon Valley”).

3. On August 8, 2025, Respondents filed a Response to Mr. Suite’s pro se habeas petition. ECF 8.

4. On August 27, 2025, the Court appointed counsel to represent Mr. Suite and ordered the parties to file a joint status report in 60 days.

¹ These dates represent the dates on which the pro se filing were received by the Clerk’s Office, not necessarily the dates that Mr. Suite provided the filings to detention staff for mailing. *See Burns v. Morton*, 134, F.3d 109, 112-13 (3d Cir. 1998) (“pro se prisoner’s habeas petition is deemed filed at the moment he delivers it to prison officials for mailing to the district court”).

5. Court-appointed counsel has communicated with Mr. Suite and with counsel for Respondents.²

6. At this time, Mr. Suite remains detained at Moshannon Valley.

7. At this time, Mr. Suite's appeal with the Board of Immigration Appeals (BIA) remains pending.

8. Counsel for Mr. Suite requests permission to file a Counseled Memorandum in Support of Mr. Suite's Habeas Petition on or before November 10, 2025.

9. Court-appointed counsel does not have access to Mr. Suite's medical records from FDC Philadelphia or Moshannon Valley. Court-appointed counsel also does not have access to the record (filings, exhibits, or hearing transcripts) of the proceedings before the Immigration Court or the Board of Immigration Appeals. Thus, to the extent this Court believes necessary for the resolution of Mr. Suite's habeas petition, Counsel reserves the right to request leave to conduct discovery under Rule 6 of the Rules Governing Section 2254 Cases (applicable to § 2241 petitions under Rule 1(b)).

10. If the Court grants Mr. Suite permission to file a Counseled Memorandum in Support of his Habeas Petition, Respondents request the opportunity to file a response to that new filing, and to any other requests that Mr. Suite may make to this Court.

² Prior to being informed that counsel was appointed in this matter, Mr. Suite submitted *pro se* filings to detention officials for filing with this Court.

WHEREFORE, for the reasons stated above, Mr. Suite requests permission to file a Counseled Memorandum in Support of the Pro Se Petition for Writ of Habeas Corpus on or before November 10, 2025; Respondents do not object to Petitioner's request, but request the opportunity to respond to such a filing.

Respectfully submitted,

DATE: October 27, 2025

/s/ Susan M. Lin
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Dated: October 27, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2025, the foregoing Joint Status Report was filed via the Court's CM/ECF system, is available for viewing and downloading, and, as such, was served upon the below counsel:

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/s/ Susan M. Lin
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