

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

David BUCKINGHAM

Petitioner-Plaintiff,

v.

John TSOUKARIS, in his official capacity as Field Office Director of Newark, New Jersey, Immigration and Customs Enforcement; Todd M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and Pamela BONDI, Attorney General, U.S. Department of Justice, et al.

Respondents-Defendant

Case No.: 2:25-cv-14601

REQUEST FOR EXPEDITED CONSIDERATION

Petitioner respectfully requests expedited consideration pursuant to 28 U.S.C. § 2243 and the Court's inherent authority to manage its docket. Petitioner David Buckingham (A-No.  ) has been transferred outside of New Jersey and according to the ICE locator accessed today, he is presently detained at the Alexandria Staging Facility (ASF), 96 George Thompson Dr., Alexandria, LA 71303.

Continued civil detention inflicts ongoing irreparable harm, and the staging facility's transfer function poses a risk that Petitioner will be moved in a manner that could frustrate effective judicial review.

Petitioner respectfully proposes the following schedule, or any schedule that this Court deems appropriate:

- Respondents' Return/Response: within 5 court days of the Court's order;
- Petitioner's Reply: within 2 court days thereafter;
- Hearing: at the Court's earliest convenience, and in any event within 10–14 days of the order.

Expedited treatment will not prejudice Respondents, who control the relevant records and detention information.

Dated: August 14, 2025

Respectfully submitted,

/s/ Veronica Cardenas
Veronica Cardenas, NJ BAR 022052010
Cardenas Immigration Law

Veronica Cardenas, Esq.
2 Arnot St.,
Ste 6, Unit 122
Lodi, NJ 07644
Tel: 201.470.4549
veronica.cardenas@cardenasimmigrationlaw.com

Attorney for the Petitioner

CERTIFICATE OF SERVICE

I certify that on August 15, 2025, I filed the foregoing Request for Expedited Consideration via CM/ECF, which will send notice to all counsel of record. Courtesy Copy send to Civil Process Clerk: USAO-D.N.J., 970 Broad St., 7th Floor, Newark, NJ 07102.

/s/ Veronica Cardenas
Veronica Cardenas