

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

**David BUCKINGHAM**

*Petitioner-Plaintiff,*



Case No.: 2:25-cv-14601

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*

**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**

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**Attorney for the Petitioner**

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**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., 7<sup>th</sup> Floor, Newark, NJ 07102.

/s/ Veronica Cardenas

Veronica Cardenas