

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

JORGE ALBERTO PICON

Petitioner,

v.

Civil Action No. 2:25-cv-6731

DAVID O'NEILL, in his official capacity as ICE Deputy Field Office Director, TODD M. LYONS, in his official capacity as Acting Director of Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of Homeland Security, and PAMELA BONDI, in her official capacity as Attorney General of the United States, and J.L. JAMISON, in his official capacity as Philadelphia Federal Detention Center;

Respondents.

STIPULATION FOR PROPOSED SCHEDULING ORDER

Petitioner seeks a writ of habeas corpus in this proceeding. Petitioner is non-citizen who has been detained by immigration authorities. To expeditiously resolve Petitioner's habeas petition, the parties hereby stipulate and agree as follows:

1. Respondents will file their brief by December 12, 2025.
2. Petitioner will file any response by December 15, 2025.
3. The parties respectfully request that the Court decide the petition on the papers at the Court's earliest convenience.

Dated: December 10, 2025

/s/ Adam Solow _____

Adam Solow, Esquire
Solow, Harnett & Galvan, LLC
1601 Walnut Street, Suite 1200
Philadelphia, PA 19102
Telephone: (215) 330-5244
adam@shglawpa.com

Counsel for Petitioner

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Eric S. Wolfish _____

ERIC S. WOLFISH
Assistant United States Attorney
Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
Phone: (215) 861-8598
Email: eric.wolfish@usdoj.gov

Counsel for Respondents

BY THE COURT:

Honorable Mia Roberts Perez
Judge, United States District Court

CERTIFICATE OF SERVICE

I certify that on December 10, 2025, a true and correct copy of the foregoing Stipulation was filed electronically via the Court's CM/ECF system and served via CM/ECF on all counsel of record.

/s/ Eric S. Wolfish
ERIC S. WOLFISH