

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

Juan Angel LARA CORDON,
Petitioner,

v.

Jamal L. JAMISON, *et al.*,
Respondents.

No. 25-cv-6937

STIPULATION TO EXTEND DEADLINES

WHEREAS, on December 29, 2025, this Court entered a Memorandum Order granting Petitioner Juan Angel Lara Cordon’s Petition for Writ of Habeas Corpus;

WHEREAS, under the Equal Access to Justice Act (“EAJA”), 28 U.S.C. § 2412(d)(1)(B), the current deadline for Petitioner to file an application for fees and other expenses is March 29, 2026;

WHEREAS, the parties are currently engaged in good-faith negotiations regarding Petitioner’s claim for attorney’s fees and costs;

WHEREAS, the parties wish to extend the deadline for filing a motion for fees and costs by thirty (30) days to allow time to conclude these negotiations and potentially resolve the fees issue without further litigation, thereby conserving judicial resources;

WHEREAS, Petitioner’s counsel, Karen Hoffmann, Esq., and Respondents’ counsel, Assistant U.S. Attorney Anthony St. Joseph, Esq., have conferred and agreed to this extension;

It is hereby **STIPULATED** and **AGREED** by and between the parties, through their undersigned counsel, subject to the approval of the Court, that:

1. The deadline for Petitioner to file a motion for attorney's fees and costs under the EAJA or other applicable statutes is hereby extended by thirty (30) days.
2. The new deadline for said filing shall be **April 28, 2026**.

BY: /s/Karen L. Hoffmann
Karen L. Hoffmann, Esquire
ELLENBERG LAW GROUP

Counsel for Petitioner

BY: /s/Anthony St. Joseph
Anthony St. Joseph, Esquire
Assistant United States Attorney

Counsel for Respondents

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PROPOSED ORDER

THIS MATTER having come before the Court upon the parties' Joint Stipulation to Extend Deadlines for Filing a Motion for Attorney's Fees and Costs; and the Court having considered the stipulation and for good cause shown;

IT IS on this ____ day of _____, 2026,

ORDERED that the deadline for Petitioner to file a motion for attorney's fees and costs pursuant to the Equal Access to Justice Act ("EAJA"), 28 U.S.C. § 2412, or any other applicable statute, is hereby **EXTENDED** by thirty (30) days; and it is further

ORDERED that Petitioner shall file said motion, if necessary, on or before **April 28, 2026**.

SO ORDERED.

Hon. Anita B. Brody, U.S.D.J.