

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARCO TULIO VASQUEZ PEREZ,

Petitioner,

v.

KEVIN RAYCRAFT, in his official capacity as Field Office Director of Enforcement and Removal Operations, Detroit Field Office, Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, in her official capacity as U.S. Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

Respondents.

Case No. 25-cv-13986

Hon. Jonathan J.C. Grey

Hon. Curtis Ivy, Jr (referral)

STIPULATED ORDER REQUIRING RESPONSE

On December 11, 2025, Petitioner Marco Tulio Vasquez Perez filed a petition for a writ of habeas corpus challenging his detention by Respondents. (ECF No. 1, PageID.1.) For good cause, the Court may set

a deadline for the Respondents to respond to the petition. *See* 28 U.S.C. § 2243. Accordingly, **IT IS STIPULATED** by the parties that:

1. Respondents shall respond to the petition for a writ of habeas corpus no later than **December 29, 2025**.
2. If Petitioner chooses to file a reply, Petitioner must do so no later than three business days after Respondents file their response.
3. Petitioner has sent a copy of the petition to the U.S. Attorney's Office for the Eastern District of Michigan by certified mail, which will constitute proper service upon delivery.

Pursuant to the stipulation of the parties, **IT IS ORDERED** that Respondents shall respond to the petition for a writ of habeas corpus by **December 29, 2025**, and Petitioner must file his reply no later than three business days after Respondents file their response.

SO ORDERED.

s/ Jonathan J.C. Grey
Jonathan J.C. Grey
United States District Judge

Dated: December 17, 2025

Stipulated and agreed to by:

/s/Maria E. Daniel (P78531)
Maria Eugenia Daniel (P78531)
Carrera Law Offices PLLC
30555 Southfield Rd Suite 520
Southfield, MI 48076
(248) 924-3176

Counsel for Petitioner

Dated: December 16, 2025

Jerome F. Gorgon Jr.
United States Attorney

/s/ Zak Toomey
Zak Toomey (MO61618)
Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, Michigan 48226
(313) 226-9617
zak.toomey@usdoj.gov

Counsel for Respondents
Date: December 16, 2025

Certificate of Service

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or First-Class U.S. mail addresses disclosed on the Notice of Electronic Filing on December 17, 2025.

s/ S. Osorio
Sandra Osorio
Case Manager