

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

HENRY JOEL MENDIETA CHAVEZ,	:	
	:	
Petitioner,	:	
	:	
v.	:	Civil Action No. 25-6968
	:	
Warden of Federal Detention Center	:	
Philadelphia; BRIAN MCSHANE, in	:	
his official capacity as Field Office	:	
Director of the Immigration and	:	
Customs Enforcement and Removal	:	
Operations, Philadelphia Field Office;	:	
TODD LYONS, in his official capacity	:	
as Acting Director of U.S. Immigration	:	
and Customs Enforcement; and	:	
KRISTI NOEM, in her official capacity	:	
as Secretary of the Department of	:	
Homeland Security,	:	
	:	
Respondents.	:	

STIPULATION AND (PROPOSED) ORDER

Petitioner is non-citizen who has been detained by immigration authorities and filed this action for writ of habeas corpus on December 11, 2025. (ECF No. 1). On today's date, Respondents were made aware of the petition; the undersigned attorney filed a notice of appearance (ECF No. 4); and Respondents advised the Court they would respond to the petition by or before January 9, 2026.

To expeditiously resolve the petition, the parties hereby stipulate and agree to waive oral argument and respectfully request that the petition for writ of habeas corpus be decided on the papers at the Court's earliest convenience.

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Frank B. Lindner, Esq.
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Counsel for Respondents

APPROVED AND SO ORDERED.

Dated: _____

MARY KAY COSTELLO
United States District Court Judge