

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

SALVADOR BETETA RAMIREZ,

Petitioner,

v.

J.L. JAMISON, Warden
of Federal Detention Center,
Philadelphia; BRIAN MCSHANE,
Acting Philadelphia Field Office
Director, United States Immigration
and Customs Enforcement; TODD
LYONS, Acting Director of Immigration
and Customs Enforcement; KRISTI
NOEM, Secretary of the Department of
Homeland Security; PAMELA BONDI,
Attorney General of the United States,

Respondents.

CIVIL ACTION

Case No. 2:25-cv-7316

**STIPULATION EXTENDING THE GOVERNMENT'S DEADLINE
TO RESPOND TO PETITIONER'S MOTION FOR ATTORNEY'S FEES**

It is hereby stipulated by the undersigned counsel, subject to the Court's approval, as follows:

1. Petitioner is non-citizen who has been detained by immigration authorities and filed this action for a writ of habeas corpus on December 24, 2025 (ECF No. 1).
2. On January 5, 2026, the Court granted the Petition for Writ of Habeas Corpus (ECF No. 7).
3. On April 2, 2026, Petitioner filed a Motion for Attorney's fees (ECF No. 9) under the Equal Access to Justice Act.

4. Respondents' response to the motion is currently due on April 16, 2026.

5. The parties have agreed that the Respondents' time to respond to the Motion for Attorney's Fees is extended until April 30, 2026;

6. Pursuant to Local Civil Rule 5.1.2, counsel for the parties consent to the submission of this stipulation with their electronic signatures below.

Dated: April 3, 2026

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Jose C. Campos
JOSE C. CAMPOS, ESQ.
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Counsel for Respondents

BY THE COURT

Dated: _____

JOHN F. MURPHY
United States District Court Judge

CERTIFICATE OF SERVICE

I certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: April 3, 2026

/s/ Isaac J. Jean-Pierre
ISAAC J. JEAN-PIERRE
Assistant United States Attorney