

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Francisco Zamora Guasco,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department
of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,
and

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 26-cv-722 (JMB/ECW)

**MOTION FOR ATTORNEY'S FEES
AND COSTS**

Petitioner Francisco Zamora Guasco, by and through undersigned counsel, moves for an award of attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), 28 U.S.C. § 2412(d).

As the accompanying memorandum, declarations, and exhibits outline in detail, fees are mandatory pursuant to the Equal Access to Justice Act, because Petitioner prevailed and the Government's position—repeatedly rejected by this Court—was not substantially justified.

Dated: March 2, 2026

s/Tim Phillips

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