

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

ALERXI RONDON REYES

Petitioner,

v.

JAMAL L. JAMISON, ET AL.,

Respondents.

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Civil Action No. 2:26-cv-1324 (Kenney)

STIPULATED PRELIMINARY PROTECTIVE ORDER

Petitioner Alerxi Rondon Reyes and Respondents, by and through their undersigned counsel, hereby stipulate and agree to the imposition of a preliminary protective order, not subject to Court approval, that would restrict the use and dissemination of protected information pending either the parties' agreement that the documents may be subject to a stipulated protective order, or to give Respondents an opportunity to move the Court for imposition of a protective order.

This stipulated preliminary protective order involves a certain program related record of the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE). The document is marked by DHS, ICE "for internal use only," and, therefore, Respondents propose to file this document with the Court under the protection of a joint protective order.

Before taking a position on whether this document may be filed under the protection of a joint protective order, Petitioner's counsel desires to receive and review the document. Accordingly, to protect the confidentiality of this document, Respondents will transmit the document to Petitioner for their review.

Once Petitioner receives the document, Petitioner agrees that neither he nor his counsel shall share, copy, forward, transmit, or otherwise distribute the document, or materially discuss their contents with anyone. Petitioner shall review

the document and advise as to whether they will join Respondents' motion for a stipulated protective order. If Petitioner does not agree, Petitioner agrees that he will not share, copy, forward, transmit, or otherwise distribute this document, or materially discuss its contents with anyone pending either a resolution of a motion for a protective order by Respondents or notification by Respondents that it will not seek a protective order.

Upon conclusion of this action (including appeals), all copies of these materials shall be returned to Respondents' counsel or destroyed by Petitioner's attorneys.

AGREED AND STIPULATED TO:

Date: 03/13/2026

Date: 03/15/2026

DAVID METCALF
U.S. Attorney

/s/ Mikaela Wolf Sorokin
Mikaela L. Wolf-Sorkin
Defender Association of Philadelphia
1441 Sansom Street
Philadelphia, PA 19102
MLWolfSorokin@philadefender.org

/s/ Daniella D. Lees
Daniella Lees
Special Assistant U.S. Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
daniella.lees@usdoj.gov

Counsel for Petitioner

Counsel for Respondents