

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

IBRAHIM DIA

Petitioner,

v.

JAMAL L. JAMISON, ET AL.,

Respondents.

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Civil Action No. 2:26-cv-1669 (Henry)

STIPULATED PROTECTIVE ORDER

Petitioner Ibrahim Dia and Respondents, by and through their undersigned counsel (hereinafter “the parties”), do hereby agree and stipulate that they will be bound by the terms and conditions of this Stipulated Protective Order, covering disclosure and handling of certain protected information as set forth below:

1. On March 15, 2026, Petitioner filed a Petition for a Writ of Habeas Corpus in connection with his detention by Immigration and Customs Enforcement (ICE) following the revocation of his Order of Supervision. ECF 1.
2. Respondents filed their Opposition on March 19, 2026, noting in that Opposition their intent to file a certain program related record of the Department of Homeland Security, Immigration and Customs Enforcement (ICE). The record is marked by DHS, ICE “for internal use only” given it contains non-public protected information that is For Official Use Only (FOUO) and that is law enforcement sensitive (LES).
3. The parties agree that this document and the information contained therein shall be held in strict confidentiality and may be used solely for purposes of

this litigation. To that end, the parties agree that neither Petitioner nor his attorneys will share, copy, forward, transmit, or otherwise distribute this document, or materially discuss its contents with anyone.

4. The parties shall make all reasonable efforts to not unnecessarily duplicate the document subject to this Order.
5. Any person who has access to this document (a) shall be informed that it is confidential and subject to non-disclosure, and (b) must agree to be bound by this Order's terms.
6. Upon conclusion of this action (including appeals), all copies of this document shall be returned to Respondents' counsel or destroyed by Petitioner's attorneys.
7. The designation of confidential information in this document shall be made by placing or affixing on the document, in a manner which will not interfere with its legibility, the word "CONFIDENTIAL."
8. Should either party intend to use this document in a manner in which it may become public record (for example, in a court filing), the party shall redact all personally identifiable information from the document, as mandated by Local Rule 5.1.3 of the United States District Court for the Eastern District of Pennsylvania.
9. The Court reserves its inherent power to modify the terms of this agreement and permit the disclosure of information where the interest of justice so requires.

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

AGREED AND STIPULATED TO:

Date: 03/17/2026

/s/ 

Christine M. Flowers
Joseph M. Rollo & Associates, PC
2527 N. Broad Street, 2nd Floor
Philadelphia, PA 19148
jmrollo@sbcglobal.net

Counsel for Petitioner

Date: 03/17/2026

DAVID METCALF
U.S. Attorney

DANIELLA
/s/ LEES (Affiliate) Digitally signed by
DANIELLA LEES (Affiliate)
Date: 2026.03.20 11:51:03
-04'00'
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Counsel for Respondents

BY THE COURT:

HONORABLE CATHERINE HENRY
*United States District Court
Eastern District of Pennsylvania*