

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

G.B.T.,

Petitioner,

v.

JOHN RIFE, ET AL.,

Respondents.

Civil Action No. 2:26-cv-01842

RESPONSE TO MOTION TO SET CONSOLIDATED BRIEFING SCHEDULE

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Dated: April 9, 2026

On March 20, 2026, Petitioner filed a Petition for a Writ of Habeas Corpus that included—within the same filing—a separate Complaint for injunctive and declaratory relief (ECF 1). Respondents responded to the habeas petition on April 7, 2026, arguing—among other things—that the petition is moot as ICE removed Petitioner’s ankle monitor on March 27, 2026 (ECF 13).

Petitioner also filed a motion to set a consolidated briefing schedule, which contemplates a broader policy challenge and the filing of an administrative record. (ECF 12). Because the Court’s ruling on the now-briefed habeas petition may moot or significantly narrow the claims, Respondents ask the Court to hold Petitioner’s motion to set a briefing schedule in abeyance until after the Court has decided the habeas petition. To the extent the Court believes that Petitioner still has standing to raise the claims for injunctive and declaratory relief upon resolution of the habeas petition, Respondents respectfully ask for at least sixty days to brief those issues.

Respectfully submitted,

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Dated: April 9, 2026

CERTIFICATE OF SERVICE

I certify that on this date, I filed the foregoing Response to Motion to Set Consolidated Briefing Schedule via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

Dated: April 9, 2026

/s/ Daniella D. Lees

DANIELLA D. LEES
Assistant United States Attorney