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

CUSI CHAISA, RAUL	:	
	:	
Petitioner,	:	Civil Action No. 26-cv-2560 KBH
	:	
v.	:	
	:	
J. L. JAMISON, *et al.*	:	
	:	
Respondents.	:	

STIPULATION AND PROPOSED ORDER EXTENDING THE TIME FOR THE GOVERNMENT TO RESPOND TO PETITIONER'S REQUEST FOR ATTORNEY FEES

Petitioner Raul Cusi Chaisa and Respondents (together "the Parties"), subject to the Court's approval, stipulate as follows:

1. On April 18, 2026, Petitioner filed a Petition for Writ of Habeas Corpus, and included in his petition a request for costs and attorneys' fees under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412. *See* ECF No. 1.
2. In its May 1, 2026 Order granting the petition, the Court directed Respondents to respond to that request on or before May 8, 2026. ECF No. 6 at ¶ 7.
3. The parties agree that the Respondents' time to respond to the motion be enlarged in deference to the pending appeals in the Third Circuit in *Lopes De Andrade v. Director Philadelphia Field Office Immigration and Customs Enforcement, et al.*, No. 26-1454 (3d Cir.), and *Buele Morocho v. Warden Philadelphia FDC, et al.*, No. 26-1150 (3d Cir). The Third Circuit scheduled the matters for disposition by the Court during the week of May 11, 2026.
4. The parties believe that the Third Circuit's decision will provide additional clarity to the question of whether Respondents' position was substantially justified.

5. The parties stipulate that the Respondents' time to respond to the motion shall be extended to June 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.

So stipulated,

Dated: May 7, 2026

DAVID METCALF
United States Attorney

/s/ *Mikaela Wolf-Sorokin*
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Counsel for Respondents

SO ORDERED:

_____
HONORABLE KELLY B. HODGE
Judge, United States District Court

Date: