## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

ADHAM AMIN HASSOUN,

Petitioner,

v.

JEFFREY SEARLS, in his official capacity Acting Assistant Field Office Director and Administrator of the Buffalo Federal Detention Facility, Case No. 1:19-cv-00370-EAW

## NOTICE OF MOTION

Respondent.

## NOTICE OF MOTION

PLEASE TAKE NOTICE that the above-named Petitioner, by his attorneys, moves for

Petitioner's declaration in support of his Response to Respondent's Motion to Enforce the

Protective Order, ECF No. 110, to be filed under seal. Petitioner attaches a declaration by A.

Nicole Hallett in support of his Motion.

Respectfully Submitted,

Jonathan Hafetz Brett Max Kaufman Charlie Hogle\* American Civil Liberties Union Foundation 125 Broad Street, 18th Floor New York, NY 10004 212-549-2500 jhafetz@aclu.org \*not admitted in the W.D.N.Y.

Judy Rabinovitz Celso Perez American Civil Liberties Union Foundation <u>/s/ A. Nicole Hallett</u> A. Nicole Hallett *Supervising Attorney* Brian Zagrocki Naphtalie Librun-Ukiri Samantha Becci *Student Attorneys* Mandel Legal Aid Clinic University of Chicago Law School 6020 S. University Avenue Chicago, IL 60637 773-702-9611 nhallett@uchicago.edu

## Case 1:19-cv-00370-EAW Document 111 Filed 03/18/20 Page 2 of 2

Immigrants' Rights Project 125 Broad Street, 18th Floor New York, NY 10004 212-549-2616 jrabinovitz@aclu.org

Victoria Roeck Christopher Dunn New York Civil Liberties Union Foundation 125 Broad Street, 19th Floor New York, NY 10004 212-607-3300 cdunn@nyclu.org Jonathan Manes Supervising Attorney Roderick & Solange MacArthur Justice Center 160 E. Grand Ave., 6th Floor Chicago, IL 60611 312-503-0012 jonathan.manes@law.northwestern.edu

Erin Barry Colton Kells Marline Paul *Student Attorneys* University at Buffalo School of Law 507 O'Brian Hall, North Campus Buffalo, NY 14260 716-645-2167

Counsel for Petitioner

Dated: March 18, 2020 Chicago, IL