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 this

Court for an order 1) compelling the Respondent to supplement its discovery responses and 2)

prohibiting the government from calling the Petitioner as a witness.

The grounds for this motion are more fully set forth in the Memorandum in Support of

Petitioner's Motion to Compel and for a Protective Order and attached exhibits.

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 *New York bar admission pending <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 Judy Rabinovitz Celso Perez American Civil Liberties Union Foundation Immigrants' Rights Project 125 Broad Street, 18th Floor New York, NY 10004 212-549-2616 jrabinovitz@aclu.org

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Counsel for Petitioner

Dated: February 28, 2020 Chicago, IL