

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

NIZAR TRABELSI,
Petitioner-Plaintiff,

v.

JEFFREY CRAWFORD, in his official
capacity as Warden of the Farmville Detention
Center;

LIANA CASTANO, in her official capacity as
Field Office Director of the Immigration and
Customs Enforcement, Enforcement and
Removal Operations Washington Field Office;

ALEJANDRO MAYORKAS, in his official
capacity as Secretary of Homeland Security;

and

MERRICK B. GARLAND, in his official
capacity as U.S. Attorney General,
Respondents-Defendants.

Case No. 1:24-cv-01509-RDA-LRV

**FEDERAL RESPONDENTS-DEFENDANTS' MOTION TO DISMISS AND
MOTION FOR SUMMARY JUDGMENT**

Pursuant to this Court's order of September 27, 2024 (ECF No. 26) and Federal Rules of Civil Procedure 12 and 56, Federal Respondents-Defendants Liana Castano, Director of U.S. Immigration and Customs Enforcement's (ICE) Washington Field Office; Alejandro Mayorkas, Secretary of Homeland Security; and Merrick B. Garland, U.S. Attorney General, submit this motion to dismiss and motion for summary judgment on Plaintiff's claims. The grounds for this motion are more fully explicated in the memorandum of law that has been simultaneously filed with the motion.

DATED: November 8, 2024

Respectfully submitted,

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/s/ _____

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CERTIFICATE OF SERVICE

I do hereby certify that on this 8th day of November, 2024, I have electronically filed the foregoing using the CM/ECF system.

 /s/

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