## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

NIZAR ABDULAZIZ TRABELSI,

*Petitioner–Plaintiff*,

v.

JEFFREY CRAWFORD, et al.,

Respondents-Defendants.

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

## **NOTICE**

Petitioner—Plaintiff Nizar Trabelsi writes to inform the Court of recent developments in this matter and to present an intended course for bringing this action to a conclusion.

On or about August 8, 2025, the United States removed Petitioner–Plaintiff to Belgium. As a result, Petitioner-Plaintiff's pending claims challenging conditions of his confinement in immigration custody, see ECF No. 1 at 23–24, are moot.

Counsel for the parties are agreeable to filing a stipulation of voluntary dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). As a result, there is no further need for the Court to address the parties' currently pending motions. See, e.g., ECF No. 38 (Respondents-Defendants' motion for summary judgment on Petitioner-Plaintiff's non-habeas claims); ECF No. 45 (Petitioner-Plaintiff's motion for discovery relevant to motion for summary judgment).

Before filing that document and causing the administrative closure of this case, Petitioner-Plaintiff intends to move the Court to vacate, under *United States v. Munsingwear*, 340 U.S. 36 (1950), its decision granting the government's motion to dismiss Petitioner-Plaintiff's claims sounding in habeas. ECF No. 50. Petitioner–Plaintiff anticipates filing that motion within 30 days.

## Respectfully submitted,

## /s/ Sophia Gregg

Sophia Leticia Gregg VSB No. 91582 ACLU of Virginia P.O. Box 26464 Richmond, VA 23261 804.774.8242 sgregg@acluva.org

Brett Max Kaufman\* Charlie Hogle\* Judy Rabinovitz \* **ACLU** Foundation 125 Broad St., 18th Floor New York, NY 10004 212.549.2500 bkaufman@aclu.org

Cecillia D. Wang\* **ACLU** Foundation 425 California Street, Suite 700 San Francisco, CA 94104 415.343-0775 cwang@aclu.org

\*Admitted Pro Hac Vice Counsel for Petitioner-Plaintiff Dated: August 19, 2025

A. Nicole Hallett\* Supervising Attorney Mariam Nadi Student Attorney Edwin F. Mandel Legal Aid Clinic 6020 South University Avenue Chicago, Illinois 60637 203.910.1980 nhallett@uchicago.edu

Jonathan Hafetz\* Seton Hall Law School 1109 Raymond Blvd. Newark, NJ 07102 jonathan.hafetz@shu.edu