

**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

PETITIONER–PLAINTIFF’S MOTION TO VACATE

Pursuant to Federal Rule of Civil Procedure 60(b)(6), Petitioner–Plaintiff Nizar Trabelsi respectfully moves the Court to vacate its memorandum opinion and order of December 2, 2024, in the above-captioned matter (ECF No. 50). In support of this motion, Petitioner–Plaintiff submits the accompanying memorandum of law and proposed order.

Date: September 18, 2025

Respectfully submitted,

/s/ Sophia Leticia Gregg

Sophia Leticia Gregg

VSB No. 91582

ACLU of Virginia

P.O. Box 26464

Richmond, VA 23261

804.774.8242

sgregg@acluva.org

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

(Counsel continued on following page)

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

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

Counsel for Petitioner–Plaintiff

* Admitted Pro Hac Vice