

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-1935 (JMF)

**NOTICE OF MOTION FOR
RELEASE UNDER *MAPP V. RENO***

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declaration and exhibits, Amended Petition, and previously filed briefing in this action, Plaintiff-Petitioner Mahmoud Khalil, through counsel, hereby moves this Court for an order of immediate release under *Mapp v. Reno*, 241 F.3d 221 (2d Cir. 2000).

Dated: March 14, 2025

Respectfully submitted,

**WASHINGTON SQUARE LEGAL SERVICES,
INC.**

IMMIGRANT RIGHTS CLINIC

_____/s/_____
Alina Das, Esq.

245 Sullivan Street, 5th Floor
New York, New York 10012
Tel: (212) 998-6430
alina.das@nyu.edu

CENTER FOR CONSTITUTIONAL RIGHTS

/s/

Baher Azmy
Samah Sisay
Diala Shamas
666 Broadway, 7th Floor
New York, NY 10012
(212) 614-6436
bazmy@ccrjustice.org
ssisay@ccrjustice.org
dshamas@ccrjustice.org

CLEAR PROJECT

MAIN STREET LEGAL SERVICES, INC.

/s/

Ramzi Kassem
Naz Ahmad
Mudassar Hayat Toppa
Shezza Abboushi Dallal
CUNY School of Law
2 Court Square
Long Island City, NY 11101
(718) 340-4558
ramzi.kassem@law.cuny.edu
naz.ahmad@law.cuny.edu
mudassar.toppa@law.cuny.edu
shezza.dallal@law.cuny.edu

**NEW YORK CIVIL LIBERTIES UNION
FOUNDATION**

/s/

Amy Belsher
Robert Hodgson
Veronica Salama
Molly Biklen
125 Broad Street, 19th Floor
New York, N.Y. 10004
Tel: (212) 607-3300
abelsher@nyclu.org

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

/s/

Omar Jadwat

Noor Zafar

Sidra Mahfooz*

Brian Hauss

Brett Max Kaufman

Esha Bhandari

Vera Eidelman

Tyler Takemoto*

American Civil Liberties Union Foundation

125 Broad Street, Floor 18

New York, NY 10004

ojadwat@aclu.org

**Application for admission pro hac vice forthcoming*

DRATEL & LEWIS

/s/

Amy E. Greer

29 Broadway, Suite 1412

New York, NY 10006

Phone: (212) 732-8805

Fax: (212) 571-3792

Email: agreer@dratellewis.com

Counsel for Petitioner