

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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ADHAM AMIN HASSOUN,

Petitioner,

v.

Case # 1:19-cv-00370-EAW

JEFFREY SEARLS, in his official capacity  
as Acting Assistant Field Office Director and  
Administrator, Buffalo Federal Detention  
Center,

Respondent.

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**NOTICE OF MOTION**

**MOVING PARTY:**

Respondent

**PLACE:**

Hon. Elizabeth A. Wolford  
U.S. District Court  
100 State Street  
Rochester, New York 14614

**RELIEF SOUGHT:**

Respondent respectfully requests an Order to  
permitting Respondent to file his Memorandum  
in Support of Respondent's Motion to Enforce  
and supporting Exhibits A – D under seal.

**PAPERS SUBMITTED IN SUPPORT:**

Declaration of Anthony D. Bianco, dated March  
15, 2020

Dated: March 16, 2020

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Respectfully submitted,

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