

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-370-EAW

v.

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

Respondent.

**MEMORANDUM IN SUPPORT OF MOTION TO AMEND RESPONDENT’S MOTION
TO ENFORCE PROTECTIVE ORDER & FRE 502(d) ORDER**

On March 16, 2020, the Immigration and Customs Enforcement (“ICE”) Deportation Officer who conducted the interview cited in Respondent’s Memorandum in Support of its Motion to Enforce the Protective Order and Order Pursuant to Federal Rule of Evidence 502(d) (“Memo. in Support of Mot. to Enforce”), Mar. 13, 2020 Conwall Decl., Dkt. No. 104 (under seal) Ex. C, conducted a follow up interview of the same witness. Mar. 17, 2020 Conwall Decl., Ex. A. Respondent respectfully requests that the Court grant leave to amend Respondent’s Memo. in Support of Mot. to Enforce to insert the attached declaration as Exhibit E and replace the filed Memo. in Support of Mot. to Enforce with the attached Amended Memo. in Support of Mot. to Enforce, Ex. A (with amendments highlighted). Respondent also respectfully requests that both the Amended Memo. in Support of Mot. to Enforce and Ex. E be filed under seal pursuant to the Court’s Mar. 17, 2020 Order.

Date: March 19, 2020

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