

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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.

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 staying execution of its June 22, 2020 Order pending appeal to the United States Courts of Appeals for the Second Circuit and the D.C. Circuit.

PAPERS SUBMITTED IN SUPPORT:

Memorandum of Points and Authorities in Support of Respondent's Motion to Stay; Exhibits A, B. Respondent requests a Reply.

Dated: April 30, 2020

JAMES P. KENNEDY, JR
United States Attorney
Western District of New York

/s/ Daniel B. Moar
DANIEL B. MOAR
Assistant United States Attorney
138 Delaware Avenue
Buffalo, New York 14202
Tel: (716) 843-5833
Email: daniel.moar@usdoj.gov

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

WILLIAM C. PEACHEY
Director, District Court Section
Office of Immigration Litigation

TIMOTHY M. BELSAN
Chief
National Security & Affirmative Litigation Unit
District Court Section
Office of Immigration Litigation

/s/ Anthony D. Bianco
ANTHONY D. BIANCO
Senior Counsel for National Security

/s/ Steven A. Platt
STEVEN A. PLATT
Counsel for National Security
National Security & Affirmative Litigation Unit
District Court Section
Office of Immigration Litigation
Civil Division
U.S. Department of Justice
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044-0868
Tel: (202) 532-4074
Email: steven.a.platt@usdoj.gov

Attorneys for Respondent