

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

ADHAM AMIN HASSOUN,

*Petitioner,*

v.

JEFFREY SEARLS, in his official capacity  
Acting Assistant Field Office Director and  
Administrator of the Buffalo Federal  
Detention Facility,

*Respondent.*

Case No. 1:19-cv-00370-EAW

**PETITIONER'S RESPONSE TO RESPONDENT'S NOTICE  
OF PROTECTIVE ORDER VIOLATION**

Petitioner, by and through his counsel, submits this response to Respondent's Notice of Protective Order Violation, ECF No. 277. Petitioner's counsel complied with all of their obligations under the Protective Order and Stipulation. ECF Nos. 77, 249. Petitioner attaches a Declaration of A. Nicole Hallett in support of this response.

Respectfully submitted,

/s/ A. Nicole Hallett

Jonathan Hafetz  
Brett Max Kaufman  
Charles Hogle (*pro hac vice*)  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
212-549-2500  
jhafetz@aclu.org

A. Nicole Hallett  
Mandel Legal Aid Clinic  
University of Chicago Law School  
6020 S. University Avenue  
Chicago, IL 60637  
773-702-9611  
nhallett@uchicago.edu

Judy Rabinovitz  
Celso Perez  
American Civil Liberties Union Foundation  
Immigrants' Rights Project

Jonathan Manes  
Roderick & Solange MacArthur Justice Center  
160 E. Grand Ave., 6th Floor  
Chicago, IL 60611

125 Broad Street, 18th Floor  
New York, NY 10004  
212-549-2616  
jrabinovitz@aclu.org

312-503-0012  
jonathan.manes@law.northwestern.edu

*Counsel for Petitioner*

Dated: July 27, 2020  
Chicago, IL