

Exhibit 7

**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 RESPONSES TO
RESPONDENT'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

Petitioner responds to Respondent's First Set of Interrogatories and Requests for Production served on December 27, 2019 as follows.

GENERAL OBJECTIONS AND RESPONSES

1. Petitioner objects to the Respondent's First Set of Interrogatories and Requests for Production to the extent that they seek responses protected by the attorney-client privilege and the attorney work product doctrine.
2. Petitioner's responses to the First Set of Interrogatories and Requests for Production are made without waiving:
 - a. the right to object to the competence, relevance, materiality, or admissibility as evidence of any information, or the subject matter thereof, in any respect of this civil action, or any other matter;
 - b. the right to object at any time and on any grounds to any other discovery requests;

- c. the right at any time and for any reason to revise, supplement, correct, add or to clarify these responses;
 - d. the right to supplement these responses after receiving responses to Petitioner's discovery requests to Respondent served on December 23, 2019;
 - e. any applicable privilege, including but not limited to the attorney-client privilege, and the Fifth Amendment privilege against self-incrimination.
3. Petitioner objects to the extent that the First Set of Interrogatories and Requests for Production call for information and documents related to impeachment of Respondent's witnesses.

INTERROGATORIES

- 1. Identify each person that YOU expect to call as a witness, and each person YOU may call as a witness if the need arises, at the evidentiary hearing to be set by the Court in this matter.**

Petitioner objects to this interrogatory to the extent that it requests information Petitioner is unable to provide before Respondent has provided all evidence underlying the decision to certify him pursuant to 8 U.S.C. § 1226a. Subject to that objection and the general objections and responses above, including that Petitioner may call additional witnesses upon receiving such evidence from Respondent, including any evidence expected be introduced through expert witnesses, Petitioner states that he may call the following witnesses:

Adham Hassoun
4250 Federal Drive
Batavia, NY 14020

Rami Abuziyad
3521 Farrington St., Apt. 4R
Flushing, NY 11354

Daniel McGowan
American Civil Liberties Union

125 Broad Street, 18th Fl.
New York, NY 10004

Andy Stepanian
39 Newfoundland Ave.
Huntington, NY 11743

- 2. Identify each document or other exhibit that YOU expect to offer, and each document or other exhibit YOU may offer if the need arises, at the evidentiary hearing to be set by the Court in this matter.**

Petitioner objects to this interrogatory to the extent that it requests information Petitioner is unable to provide before Respondent has provided all evidence underlying the decision to certify him pursuant to 8 U.S.C. § 1226a. Subject to that objection and the general objections and responses above, Petitioner states that he may seek to introduce any of the exhibits that he submitted with his April 10, 2019 response to the government's Notice to Alien of Intent and Factual Basis to Continue Detention served on February 22, 2019.

REQUESTS FOR PRODUCTION

- 1. All documents and other evidence that tend to contradict YOUR claim that YOUR detention is not authorized by 8 U.S.C. § 1226a, including, but not limited to, all documents and other evidence that would tend to undermine the credibility of YOU and/or any of YOUR witnesses.**

None.

- 2. All documents or other evidence YOU intend to introduce, or may introduce, or intend to rely on or otherwise reference at the evidentiary hearing to be set by the Court in this matter.**

Petitioner objects to this request for production to the extent it requires Petitioner to determine what documents or other evidence he may introduce before Respondent has provided all evidence underlying the decision to certify him pursuant to 8 U.S.C. § 1226a. Subject to that objection and the general objections and responses above, Petitioner states that he may seek to introduce any of the exhibits that he submitted in his April 10, 2019

response to the government's Notice to Alien of Intent and Factual Basis to Continue Detention served on February 22, 2019. Respondent is in possession of all such documents.

3. To the extent not otherwise requested in these Requests, any documents YOU relied on, identified, or otherwise referenced or consulted in YOUR responses to Respondent's First Set of Interrogatories to Petitioner.

Petitioner objects to this request for production to the extent it seeks documents protected by the attorney-client privilege and the attorney work product doctrine. Subject to this objection and the general objections and responses above, Petitioner states that there are no non-privileged documents responsive to this request.

Respectfully submitted,

/s/ A. Nicole Hallett

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Dated: January 6, 2020
Chicago, IL