

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BADAR KHAN SURI

Petitioner,

v.

DONALD TRUMP, *et al.*,

Respondents.

Case No. 1:25-cv-480

CONSENT MOTION FOR EXPEDITED BRIEFING AND CONSIDERATION

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 7, Petitioner Badar Khan Suri respectfully requests that the Court enter an expedited schedule for consideration of his Motion to Compel Respondents to Return Petitioner to this District (ECF No. 5) and his Motion for Release on Bond (ECF No. 20).

Petitioner respectfully requests that the Court set the following schedule agreed to by Respondents:

- April 1, 2025: Responsive filing due from Respondents on Petitioner's Motion to Compel his Return to this District, pursuant to this Court's order, ECF 16.
- April 8, 2025: Reply brief due from Petitioner on his Motion to Compel his Return to this District.
- April 10, 2025: Hearing date for Petitioner's Motion to Compel his Return to this District.
- April 3, 2025: Responsive filing due from Respondents on Petitioner's Motion for Release on Bond.
- April 9, 2025: Reply brief due from Petitioner on his Motion for Release on Bond.

- April 10, 2025: Hearing date for Petitioner's Motion for Release on Bond.

This case raises serious allegations regarding the government's ability to arrest and detain Petitioner (and others like him) in retaliation for exercising his First Amendment rights on matters of political concern and in conflict with the current Administration's views. Based on this retaliatory policy, Petitioner alleges that Respondents have violated and continue to violate his rights under the First and Fifth Amendments, amongst others. Since commencing this action, Petitioner has been transferred to five different detention facilities, is unable to access counsel, and is being detained in an overcrowded facility over a thousand miles away from his wife and children, where he is unable to practice his faith and where he has been effectively silenced.

Expedited briefing and decisions on these motions are necessary because, as explained in Petitioner's Motion for Release on Bond and Motion to Compel his Return, Petitioner's counsel has been and continues to be unable to access their client meaningfully, conduct confidential telephone meetings with their client, visit their client, or otherwise prepare for their client's representation in this matter. Since his arrest on March 17, respondents have not made Dr. Khan Suri available, and with one exception, *see* Declaration of Hassan Ahmad, at ¶10 (ECF No. 21-1) (noting counsel's one and *only* attorney-client call on March 25, 2025), counsel has been able to speak with him only on rare occasions on an unsecured, non-confidential line. Additionally, Dr. Khan Suri continues to be denied access to the religious accommodations he needs to observe Ramadan and practice his faith, and he continues to be isolated far from his wife and three young children. *See* Memo. in Supp. of Bond, at 11 (ECF No. 21). An expedited briefing schedule would allow full consideration of the issues involved and is critical to enable Petitioner to access his counsel and ensure that he does not suffer further harm longer than is necessary for the Court to consider these Motions.

Additionally, counsel for Petitioner conferred with counsel for Respondents on the relief requested in this motion, and Respondents have agreed to the expedited schedule proposed in this motion.

For these reasons, Petitioner requests the Court enter an order setting the expedited briefing schedule above.

Date: March 28, 2025

Respectfully submitted,

/s/Eden B. Heilman

Eden B. Heilman, VSB No. 93554
Sophia Leticia Gregg, VSB No. 91582
Vishal Agraharkar, VSB No. 93265
Geri Greenspan, VSB 76786
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF VIRGINIA
P.O. Box 26464
Richmond, VA 23261
Tel: (804) 523-2152
heilman@acluva.org
sgregg@acluva.org
vagraharkar@acluva.org
ggreenspan@acluva.org

Hassan Ahmad (VSB #83428)
The HMA Law Firm, PLLC
6 Pidgeon Hill Dr, Suite 330
Sterling, VA 20165
T: 703.964.0245
hma@hmalegal.com

Nermeen Saba Arastu (admitted *pro hac vice*)
The Immigrant & Non-Citizen Rights Clinic
Main Street Legal Services, Inc.
CUNY School of Law
2 Court Square, 5th Floor
Long Island City, NY 11101
Tel: (202) 246-0124

Nermeen.arastu@law.cuny.edu

Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Eden B. Heilman, hereby certify that on this date, I uploaded a copy of Petitioner's Motion for Expedited Briefing and Consideration and any attachments using the CM/ECF system, which will cause notice to be served electronically to all parties.

Date: March 28, 2025

Respectfully submitted,

/s/Eden B. Heilman

Eden B. Heilman, VSB No. 93554

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P.O. Box 26464

Richmond, VA 23261

Tel: (804) 523-2152

ehailman@acluva.org