

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

BADAR KHAN SURI,

*Petitioner,*

v.

DONALD J. TRUMP, *et al.*,

*Respondents.*

Case No. 1:25-cv-00480 (PTG/WBP)

**NOTICE OF SUBMISSION**

Pursuant to the Court's May 1, 2025 Order (ECF #55), attached is the Declaration of Mark Graham, Assistant Field Office Director, Richmond, Virginia Field Office of Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement.<sup>1</sup>

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<sup>1</sup> Federal Respondents wish to explicitly correct undersigned counsel's representation at the May 1, 2025 hearing that the Simon Declaration filed on April 21, 2025, *see* Dkt. 49-1 ¶ 3, presented time-stamps in Eastern Daylight Time. Counsel's understanding was based on the April 1, 2025 Simon Declaration, *see* Dkt. 26-1 ¶ 11, which specifies Eastern Daylight Time. As reflected in the attached Graham Declaration, *see* ¶ 15, Suri was recorded as booked into the Alexandria Staging Facility shortly after 6:42 p.m. Eastern Daylight Time, which is 5:42 Central Daylight Time.

