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

PETITIONER'S SUPPLEMENTAL FILING

Pursuant to the Court's May 6, 2025 Opinion and Order, ECF No. 59, 60, Petitioner hereby submits supplemental argument and evidence in support of his Motion to Compel Return and Motion for Release on Bond, in light of his Amended Petition, ECF No. 34.

As the Court noted in its Opinion, the filing of an amended pleading normally moots pending motions. ECF No. 59 at 2, FN1. However, because the Amended Petition in this case did not change the nature or the basis of the relief requested in Petitioner's pending motions, the Court would be on sure footing to construe these motions as applying to the Amended Petition, as it did Respondents' motion to dismiss. *See Buechler v. Your Wine & Spirit Shoppe, Inc.*, 846 F. Supp. 2d 406, 415 (D. Md.), *aff'd*, 479 F. App'x 497 (4th Cir. 2012). Nonetheless, out of an abundance of caution, Petitioner renews his Motions to Compel Return and Motion for Release on Bond based on his Amended Petition. *See* ECF No. 32 ¶¶ 116-18.

I. Motion for Release on Bond

Petitioner submits additional evidence in support of his motion for release on bond and incorporates by reference the arguments made in his memorandum in support of his motion for release on bond. ECF No. 21. In addition, Petitioner supplements those arguments as follows:

A. Courts in similar cases have ordered release on bond.

Since Dr. Khan Suri's amended petition was filed, several courts have ordered the release on bond of petitioners in similar cases. On April 30, 2025, Judge Crawford of the District of Vermont ordered Mr. Mohsen Mahdawi's release on bond, finding that each of the factors articulated in *Mapp v. Reno*, 241 F.3d 221 (2d Cir. 2001), were satisfied. *Mahdawi v. Trump*, No. 2:25-CV-389, 2025 WL 1243135, at *24 (D. Vt. Apr. 30, 2025). The court found that extraordinary circumstances warranted Mr. Mahdawi's release because there was no evidence that he is a flight risk or danger to the community, and there was an urgent need to address the "persistent modern wrong" of detaining Mr. Madawi and others like him for their political belief. *Mahdawi*, 2025 WL 1243135 at *13. The court imposed minimal conditions on Mr. Mahdawi's release, including that he reside in Vermont, be permitted to travel to New York State, and attend all court hearings in person. *Id.* at *14. The court also declined to stay its decision, *id.*, and Mr. Mahdawi was released from detention the same day. The Second Circuit subsequently declined to stay the district court's ruling as well. *Mahdawi v. Trump*, No. 25-1113, 2025 WL 135366 (2d Cir. May 9, 2025).

Similarly, on May 9, 2025, Judge Sessions of the District of Vermont ordered Ms. Ozturk's immediate release from detention in Louisiana on her own recognizance without any form of Body-Worn GPS or other ICE monitoring. *Özturk v. Hyde*, No. 25-0374, Dkt 130 (D. Vt. May 9, 2025). And on May 8, 2025, Judge Kelley of the District of Massachusetts ordered the immediate release, without bond or any other conditions, of Efe Ercelik, who was arrested and detained by

ICE after his visa was revoked for his speech in support of Palestinian rights. *Ercelik v. Hyde*, No. 1:25-CV-11007-AK, 2025 WL 1361543 (D. Mass., May 8, 2025).

As in these cases, Dr. Khan Suri satisfies all of the factors in support of release under *Mapp*, and Dr. Khan Suri's immediate release from detention is warranted and necessary under these circumstances, as described below.

B. Dr. Khan Suri's Amended Petition Presents Substantial Claims.

Petitioner's Amended Petition included several constitutional claims that were not included in his initial petition, including (1) a First and Fifth Amendment freedom of association claim; (2) a Fifth Amendment claim that the Policy[1] is void for vagueness; and (3) a Fifth Amendment equal protection claim. While the claims included in the initial petition were substantial on their own, these additional claims further underscore that Petitioner's claims are substantial and meet this element of the *Mapp* standard. *Mapp*, 241 F.3d at 223.

Freedom of Association

Petitioner's claim that Respondents have targeted him in violation of his right to freedom of association—namely, his association with his spouse and her family—is clearly substantial. It is well established that the First and Fifth Amendments "restrict[] the ability of the [government] to impose liability on an individual solely because of his association with another." *N. A. A. C. P. v. Claiborne Hardware Co.*, 458 U.S. 886 at 918-19 (1982). That is because not only does due process require that guilt be personal, *Scales v. United States*, 367 U.S. 203, 224–25 (1961), but imposing guilt based on a marital or familial relationship violates the right of intimate association

[1] Dr. Khan Suri's amended petition alleges that Respondents have established a policy "to retaliate against and punish noncitizens like Dr. Khan Suri who Respondents perceive to be supportive of Palestinian rights or critical of Israel because of their actual or imputed protected speech, viewpoint, religion, national origin, or associations—including associations with Palestinians." ECF No. 34 ¶ 3.

protected by the First and Fifth Amendments, *Roberts v. U.S. Jaycees*, 468 U.S. 609, 617-18 (1984). *See also Moore v. City of E. Cleveland, Ohio*, 431 U.S. 494, 499 (1977) ("This Court has long recognized that freedom of personal choice in matters of marriage and family life is one of the liberties protected by the Due Process Clause"). To impose liability for his familial association with his wife or wife's father by virtue of his marriage "would—ironically—not even constitute 'guilt by association,' since there is no evidence that the association possesse[s] unlawful aims. Rather, liability could only be imposed on a 'guilt *for* association' theory. Neither is permissible under the First Amendment." *N. A. A. C. P. v. Claiborne Hardware Co.*, 458 U.S. at 925. Since his arrest, Respondents have been clear that they targeted Dr. Khan Suri in part because of their allegation that his "father-in-law is a senior advisor to Hamas." Ex. 1 at 2, 6. Thus, they are seeking to punish Dr. Khan Suri for an attenuated chain of familial association with his wife, her father and his former role in the Gazan government. This association is not "sufficiently substantial to satisfy the concept of personal guilt" and thus cannot "withstand attack under the Due Process Clause of the Fifth Amendment." *Scales,* 367 U.S. at 224-25.

Void for Vagueness

Dr. Khan Suri claims that the Policy violates his right to due process because it is void for vagueness, which is also a substantial claim. "It is a basic principle of due process that an enactment is void for vagueness if its prohibitions are not clearly defined." *Grayned v. City of Rockford*, 408 U.S. 104, 108 (1972). A policy can be vague for two independent reasons: if the government fails to "provide the kind of notice that will enable ordinary people to understand what conduct it prohibits," or if it would "authorize and even encourage arbitrary and discriminatory enforcement." *City of Chicago v. Morales*, 527 U.S. 41, 56 (1999). "This analysis should be conducted bearing in mind the context in which the statute is applied." *United States v. Beason*,

523 F. App'x 932, 934 (4th Cir. 2013). If the policy "interferes with the right of free speech or of association, a more stringent vagueness test should apply." *Vill. of Hoffman Ests. v. Flipside, Hoffman Ests., Inc.*, 455 U.S. 489, 499 (1982). *See also FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253–54 (2012) (when a policy affects speech, particularly "rigorous adherence to [due process] requirements is necessary to ensure that ambiguity does not chill protected speech.").

The Policy is clearly unconstitutionally vague. First, the Policy does not give Dr. Khan Suri sufficient notice of what conduct, speech, or association would subject him to detention or other adverse action. Respondents' public statements demonstrate the lack of definition regarding how the Policy will be applied. Defendant Rubio has stated that he plans to apply the Foreign Policy Ground to any "Hamas supporters in America so they can be deported."[2] Similarly, President Trump posted that the Administration would not tolerate "students at Columbia and other universities . . . who have engaged in pro-terrorist, anti-Semitic, anti-American activity," while promising to "find, apprehend, and deport these terrorist sympathizers from our country." ECF 34 ¶ 50.[3] But it is unclear what association or conduct would transform someone who supports the rights of Palestinians to live in peace into a "Hamas supporter" or "sympathizer."

In this case, Defendants have noted on social media that Dr. Khan Suri has "close connections" to an unidentified person who is allegedly a "senior advisor to Hamas" and is either a "known or *suspected*" "terrorist." ECF 34 ¶ 74[4] (emphasis added). But the phrase "close connections" is meaningless. *See California Div. of Lab. Standards Enf't v. Dillingham Const., N.A., Inc.*, 519 U.S. 316, 335 (1997) (the phrase "relate to" is meaningless because "everything is related to everything else") (Scalia, J., concurring); *New York State Conf. of Blue Cross & Blue*

[2] @marcorubio, X (Mar. 9, 2025, 6:10 PM), https://perma.cc/6EPU-6WP4.
[3] @realDonaldTrump, TruthSocial (Mar. 10, 2025, 1:05 PM), https://perma.cc/BML5-GR84.
[4] @TriciaOhio, X (Mar. 19, 2025, 8:56pm ET), https://perma.cc/E66M-CH39.

Shield Plans v. Travelers Ins. Co., 514 U.S. 645, 656 (1995) ("uncritical literalism is no more help" in construing "connection with" than it is in trying to construe "relate to."). And like the vague ordinance at issue in *Morales*, 527 U.S. at 55, the Policy, and its application to Dr. Khan Suri, has no scienter requirement: Dr. Khan Suri is not required to have any knowledge that individuals he has "connections" to are "known or *suspected* terrorist[s];" and he is not required to have any knowledge or intention to further any unlawful act committed by that individual, contrary to what is required by the Supreme Court in *Scales*. 367 U.S. at 224 ("In our jurisprudence guilt is personal…"). Far from notifying an individual of illegal conduct, this Policy is intended to be sufficiently vague so as to chill individuals from associating with groups or individuals simply because they are Palestinian or because they express support for Palestinian human rights.

The Policy, and its application to Dr. Khan Suri, also does not provide Dr. Khan Suri notice of what, if any, speech would subject him to the application of the Policy. Defendant Noem, via her Assistant Secretary Tricia McLaughlin, stated that the basis for Dr. Khan Suri's detention was "spreading Hamas propaganda and promoting antisemitism on social media." ECF 34 ¶ 74[5]; Ex. 1 at 2. But a unanimous panel of the Fourth Circuit has noted that words like "promote" and "encourage" "admit[] of a wide range of meanings depending on context." *United States v. Miselis*, 972 F.3d 518, 536 (4th Cir. 2020) (striking as unconstitutionally overbroad prohibitions on promoting, encouraging, or urging lawless action). Similarly, the Supreme Court has noted that the word "promote" has "a vast potential reach." *Rosenberger v. Rector & Visitors of Univ. of Virginia*, 515 U.S. 819, 836 (1995).

For these reasons, the Policy and its application to Dr. Khan Suri is vague: it does not clarify exactly what speech or conduct the government would consider to be "spreading Hamas

[5] @TriciaOhio, X (Mar. 19, 2025, 8:56pm ET), https://perma.cc/E66M-CH39.

propaganda," "supporting" Hamas, or "promoting antisemitism." Far from notifying individuals of what conduct is prohibited, as described above, this Policy is intentionally vague for the purpose of chilling a wide range of constitutionally-protected expression that is critical of Israel or supportive of Palestinian human rights.

Second, the Policy gives Defendants the unconstitutional, unfettered discretion that allows, or even encourages, them to arbitrarily and discriminatorily target disfavored viewpoints or associations for detention and deportation. *Morales*, 527 U.S. at 56. The Policy relies on a subjective interpretation of what constitutes a "close connection" to or "support" of Hamas, and of what constitutes "pro-terrorist," "anti-Semitic," "anti-American" speech, or "Hamas propaganda." These vague categories of prohibited speech and associations leave ample room for the state to arrest and detain individuals for any purpose they choose, including the unlawful purpose of silencing protected speech in support of Palestinian rights, or interfering with protected association. *City of Lakewood v. Plain Dealer Publ'g Co.*, 486 U.S. 750, 758 (1988) ("without . . . guideposts, *post hoc* rationalizations by the licensing official and the use of shifting or illegitimate criteria are far too easy . . . .").

Freedom of Religion

Dr. Khan Suri's claim that the government has targeted him in part based on his religion is also a substantial claim. The free exercise clause of the First Amendment "protect[s] the ability of those who hold religious beliefs of all kinds to live out their faiths in daily life through "the performance of (or abstention from) physical acts." *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 524 (2022). A plaintiff can show a violation of the free exercise clause "by showing that a government entity has burdened his sincere religious practice pursuant to a policy that is not neutral or generally applicable." *Id.* at 525 (internal quotation marks omitted). "A policy can fail this test

if it discriminate[s] on its face, or if a religious exercise is otherwise its object." *Id*. (internal quotation marks omitted). Here, the government's targeting of Dr. Khan Suri was not "neutral" or "generally applicable," and the Policy itself targets Muslim people. This is evidenced by the facts that the Policy has been applied specifically against individuals while they were returning home from iftar, including Dr. Khan Suri; the Policy reveals an anti-Muslim bias by conflating support for Palestinian rights—a perspective central to Islamic faith—with terrorism; and the Policy, and its application to Dr. Khan Suri, has resulted in burdens to his daily religious practice while in detention (e.g., he was deprived of religious accommodations, including halal food, Ramadan accommodations, a Quran, and a prayer mat, for several days to weeks).

Equal Protection

Dr. Khan Suri's claim that he was targeted in part because of Respondent's racial animus towards his wife's Palestinian origin and her connection to Palestine in violation of his right to equal protection is substantial. The Due Process Clause of the Fifth Amendment prohibits the Federal Government from denying equal protection of the laws to all persons within its jurisdiction, to the same extent as the Equal Protection Clause of the Fourteenth Amendment. *Adarand Constructors Inc. v. Pena*, 515 U.S. 200, 201 (1995) (requiring strict scrutiny review for "all racial classifications, imposed by whatever federal, state, or local governmental actor").

"Proof of racially discriminatory intent or purpose is required to show a violation of the Equal Protection Clause." *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 253 (1977). However, a petitioner asserting an equal protection claim need not "prove that the challenged action rested solely on racially discriminatory purposes" or even that racial discrimination was "the 'dominant' or 'primary' purpose. *Id*. Instead, Petitioner need only show that racial discrimination was at least "a motivating factor" for the challenged invocation of the

Policy to prevail on his equal protection claim. *Id*. at 265-66. ("When there is a proof that a discriminatory purpose has been a motivating factor in the decision, th[e] judicial deference [that courts normally afford legislators and administrators] is no longer justified.").

Respondents have made clear Dr. Khan Suri's wife's Palestinian origin was at the very least a "motivating factor" in targeting him. Specifically, they have justified his arrest and detention based on his alleged "connections" to "known or suspected terrorists," but the only factual basis of this assertion is his wife's Palestinian national origin. The government's discriminatory motive is further confirmed by Secretary Noem's own assertion that the government considers any individual sympathizing with Palestinians a "terrorist sympathizer," Ex 1, and by Defendants' practice of referring to all activities in support of Palestinian rights as "support for Hamas," *see e.g.*, ECF 26 at ¶ 1.

Consideration of these claims is not barred by the INA

Since Dr. Khan Suri's initial petition was filed, courts addressing nearly identical challenges to the same government Policy at issue here have unanimously held that no provisions of the Immigration and Nationality Act ("INA") bar consideration of a detained petitioner's claims. *Mahdawi*, 2025 WL 1243135, at *25 (holding "that there is sufficient basis for jurisdiction to proceed to the issue of release or detention" in considering whether 8 U.S.C. §§1252(g), (b)(9), (a)(5) and 1226(e) shielded the government's decision to detain Petitioner in retaliation for exercise of his First Amendment rights); *Khalil v. Joyce*, 2025 WL 1232369 (D.N.J. Apr. 29, 2025), *motion to certify appeal denied,* 2025 WL 1262349 (D.N.J. May 1, 2025) (holding that "jurisdiction is not stripped over the Petitioner's claims that the Secretary of State's determination and the alleged policy are unconstitutional."); *Ozturk v. Trump*, D. 2025 WL 1145250, at *15 (D. Vt. Apr. 18, 2025), *amended sub nom. Ozturk v. Hyde*, 2025 WL 1318154 (2d Cir. May 7, 2025) (ordering

Petitioner's physical transfer to Vermont pending a bail hearing after "having found that 8 U.S.C. § 1201(i), § 1226(e), § 1252(g), § 1252(a)(5), and § 1252(b)(9) do not bar the Court's consideration of Ms. Ozturk's constitutional and legal claims"); *Ercelik*, 2025 WL 1361543 (holding that 8 U.S.C. §§ 1201(i), 1226(e), 1252(g), 1252(a)(5), and 1252(b)(9) do not bar consideration of petitioner's claims that he was arrested and detained by ICE in retaliation for his speech in support of Palestinian rights, and ordering his immediate release).

These courts uniformly recognized that "there is nothing in the INA that categorically prevents a federal district court from reviewing a habeas petition challenging discretionary detention." *Ozturk*, 2025 WL 1145250, at *25. Respondent's arguments in this case are not meaningfully different than in those cases, and thus are without merit in this case as well.

C. Dr. Khan Suri's Case Presents Extraordinary Circumstances.

Dr. Khan Suri's Amended Petition sets out additional facts that were unavailable to counsel at the time the initial petition was filed. Those facts further underscore the extraordinary nature of Respondents' violations of Dr. Khan Suri's rights, and the harms he and his family have already suffered as a result. Because Dr. Khan Suri's current detention is punitive and intended to chill his speech and the speech of others, and because traditional bond factors weigh in favor of release, this case presents extraordinary circumstances that require release on bond while this case is pending, in order for habeas relief to be meaningful.

Punitive and retaliatory detention

Dr. Khan Suri's amended petition makes abundantly clear that his arrest and detention were purely based on his protected speech and associations and were part of an intentional policy to target non-citizens on college campuses who have spoken out in support of Palestinian rights. It further details the extraordinary lengths the government went to in order to thwart Dr. Khan Suri's

access to counsel and the courts, and to keep him detained in restrictive and overcrowded conditions far from his family. *See* ECF 59 at 23 ("[I]t appears that Respondents' goal in moving Petitioner was to make it difficult for Petitioner's counsel to file the petition and to transfer him to the Government's chosen forum."). Finally, the amended petition describes the harsh conditions of confinement which Dr. Khan Suri now experiences, in part because he is designated a "high-risk" detainee. ECF 34 ¶¶ 67-73. For nearly two months, the government has sequestered him in an overcrowded high-security dorm where some of the men are still sleeping on the floor due to lack of bed space. In detention, Dr. Khan Suri is only permitted two hours of recreation per week, has limited personal property, and has no access to the law library. *Id.* Because he is detained so far from home, he rarely has visitors. Ex. 4, Declaration of Mapheze Selah, ¶ 8.

In addition to the hardship he is experiencing himself, Dr. Khan Suri's detention has caused his wife, children, and parents to suffer emotionally, psychologically, and financially. *See generally* Ex. 4. Ms. Selah has been forced to suspend her studies and begin working in order to support herself and their three children in Dr. Khan Suri's absence. *Id.* at ¶ 17. Dr. Khan Suri's detention has had a particularly devastating impact on his oldest child. *Id.* at ¶ 12.

This case is one of several that create an "extraordinary setting" where "[l]egal residents—not charged with crimes or misconduct—are being arrested and threatened with deportation for stating their views on the political issues of the day." *Mahdawi*, 2025 WL 1243135 at *24. Dr. Khan Suri, like Mr. Mahdawi, Ms. Ozturk, Mr. Khalil, and others, is a victim of the "moral panic that [has] gripped the nation and its officials." *Id.* at *25. And like others who were arrested and detained based on their speech in support of Palestinian rights, Respondents' pursuit of detention seems to have been "triggered by [politically motivated websites]" such as Canary Mission (*Ercelik v. Hyde*, No. 1:25-CV-11007-AK, at 21-22 (D. Mass., May 8, 2025)) and CAMERA. As

a result, Dr. Khan Suri was ripped from his family, friends, and career, and locked away over a thousand miles from his former life. The government has even attempted to steal Khan Suri's reputation from him by repeating defamatory and baseless claims that he is a "terrorist sympathizer." ECF 26; Ex. 1. The lengths that the government has gone to silence and punish Dr. Khan Suri are shocking and "extraordinary in the sense that it calls upon the ancient remedy of habeas to address a persistent modern wrong." *Mahdawi*, 2025 WL 1243135, at *25.

Traditional bond factors weigh in favor of release

"[T]his is an exceptional case in that there is no evidence to support a finding that [Petitioner] is a flight risk or is a danger to the community." *D'Alessandro v. Mukasey*, W.D.N.Y. No. 08CV914RJAVEB, 2009 WL 799957, at *5 (W.D.N.Y. Mar. 25, 2009). Dr. Khan Suri is not a danger to anyone. To the contrary, he has never been arrested, charged, or even accused of any crime.[6] People who know him describe him as "deeply committed to creating an engaging learning environment"; "professional, thoughtful, and kind"; a "patient father and supportive spouse"; "commit[ted] to the tireless and difficult task of building peace and resolving conflict"; "unassuming and devoted to helping students and anyone who wants to learn"; "a welcome and calming presence"; "priorit[izing] his academic work and taking care of his young family" with a "strong commitment to justice and humanism," and so much more. ECF 21-2; Ex. 2 (letters of support). Dr. Khan Suri's commitment to nonviolence is what he is best known for both professionally and personally. ECF 21-2 at 17.

Dr. Khan Suri is also not a flight risk. He has strong ties to the Washington metropolitan area, where he lives with his U.S. citizen wife, and their three young children. He is a full-time

[6] The government's allegation that Dr. Khan Suri's presence in this country poses a threat to the U.S.'s foreign policy interests "is insufficient to support a finding that he is in any way a danger as we use that term in the context of detention and release." *Mahdawi*, 2025 WL 1243135, at *12.

professor and post-doctorate research scholar at the Alwaleed Center for Muslim-Christian Understanding at Georgetown University's Walsh School of Foreign Service.. ECF 34 at ¶¶ 25-26. The Dean of the Walsh School of Foreign Service and the current and former Directors of the Alwaleed Center support Dr. Khan Suri's release with the hope that he can return to teaching and completing his book on "Minority Rights and Majoritarianism in South Asia." ECF 21-2 at 2-3, 10-11, 15-16. Since coming to the United States, he has formed deep connections with colleagues, students, and many friends who all attest to his character and commitment to peace. *Id*.

Release is necessary to make habeas remedy effective

Dr. Khan Suri's amended petition demonstrates why his release is necessary to make the habeas remedy effective. His separation from his family, his separation from his research, teaching, and other scholarly pursuits, the complete restrictions on his liberty, and the harsh conditions of confinement he is enduring, all while demonstrating the extraordinary nature of his situation and the substantial constitution violations his case presents, render each day of detention an irremediable harm. Any ultimate success on his habeas claims will be a hollow victory if he is first required to endure months or years of difficult confinement. Further, the government's actions in arresting and detaining Dr. Khan Suri have and continue to chill the speech of Dr. Khan Suri and others similarly situated, who might wish to avoid a similar fate. *See*, *e.g.*, *Mahdawi*, 2025 WL 1243135, at *13 ("If he has been detained in retaliation for exercising those rights, release is essential to make habeas relief effective, not only for him but for others who wish to speak freely without fear of government retaliation."); *see also* Ex. 3, Open Letter from Jewish Clergy dated April 30, 2025 ("This anti-democratic assault on our Muslim, Arab, and immigrant neighbors will lead to every American, including Jewish Americans, being less safe.").

II. Motion to Compel Return

Petitioner incorporates by reference the arguments made in his memorandum in support of his motion to compel his return to Virginia. ECF No. 6. Given that the Court has now denied the Respondents' motions to dismiss and to transfer and has held that it may exercise jurisdiction over Petitioner's habeas claim, if the Court is not inclined to release Dr. Khan Suri on bond at this time, then returning him to this jurisdiction is critical to effectuating this Court's "strong interest in hearing Petitioner's claims." ECF No. 59 at 29.

Additionally, as described in Petitioner's Notice of Supplemental Authority, ECF 50 at 2, the District of Vermont has ruled in a similar case that no provision of the INA prohibited the court from ordering the government to return the petitioner to the district, and that doing so would aid the court's exercise of jurisdiction over the case by facilitating the petitioner's "ability to work with her attorneys, coordinate the appearance of witnesses, and generally present her habeas claims." *Ozturk v. Trump*, No. 2:25-CV-374, 2025 WL 1145250, at *22 (D. Vt. Apr. 18, 2025), amended sub nom. *Ozturk v. Hyde*, No. 25-1019, 2025 WL 1318154 (2d Cir. May 7, 2025). The same is true in this case and justifies an order to return Petitioner to this district.

For these reasons, Dr. Khan Suri respectfully requests that this Court order his immediate release on bond, or in the alternative, order Respondents to return him to this district.

Date: May 12, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

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

Date: May 12, 2025

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