

**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

**NOTICE OF WITHDRAWAL
OF MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that Petitioner Badar Khan Suri hereby respectfully withdraws his Motion for Leave to File Second Amended Petition for Writ of Habeas Corpus and Complaint, ECF 72, in the above-captioned action.

On June 10, 2025, Petitioner moved the Court under Federal Rule of Civil Procedure 15(a)(2) for leave to file a Second Amended Petition for Writ of Habeas Corpus and Complaint to add additional information and an additional claim related to this new information. No response to the Motion has been filed by Respondents. Upon review, and in anticipation of further changes as part of the same amendment, Petitioner respectfully withdraws the current motion and will file an updated motion for leave and corresponding proposed second amended petition and complaint in short order.

Dated: June 17, 2025

Respectfully submitted,

/s/Eden B. Heilman

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**Admitted pro hac vice*

*** Pro hac vice application forthcoming*

Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Eden Heilman, hereby certify that on this date, I uploaded a copy of Petitioner's Notice of Withdrawal of Motion for Leave to File Second Amended Petition for Writ of Habeas Corpus and Complaint using the CM/ECF system, which will cause notice to be served electronically to all parties.

Date: June 17, 2025

Respectfully submitted,

/s/ Eden B. Heilman

Eden B. Heilman, VSB No. 93554

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