

**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)

RESPONSE TO MOTION FOR LEAVE TO FILE

Without waiver of any claims, defenses, or other legal arguments, and after having reviewed the instant “Motion for Leave to File Second Amended Petition for Writ of Habeas Corpus” (ECF #78), Respondents take no position on it and defer to the Court on its resolution.

DATED: June 26, 2025

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Respectfully Submitted,

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