

**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

**ORAL ARGUMENT
REQUESTED**

MOTION FOR RELEASE ON BOND

Petitioner Badar Khan Suri, through counsel, moves this Court for an order of immediate release pending the adjudication of his habeas petition under the Court's inherent authority to grant release on bond to a habeas petitioner who warrants immediate relief and release. In support of this motion, Petitioner submits the accompanying memorandum of law, associated exhibits, and a proposed order.

Date: March 27, 2025

Respectfully submitted,

/s/Eden B. Heilman

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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 Release on Bond and any attachments using the CM/ECF system, which will cause notice to be served electronically to all parties.

Date: March 27, 2025

Respectfully submitted,

/s/Eden B. Heilman

Eden B. Heilman, VSB No. 93554

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