

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BILAL FAWZI BASHEER  
ALHALABI,

Petitioner,

v.

RANDY TATE, Warden,

Respondent.

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CIVIL ACTION NO. H:25-526

**SUPPLEMENT TO MOTION TO DISMISS PETITION FOR WRIT OF  
HABEAS CORPUS, OR ALTERNATIVELY, MOTION FOR SUMMARY  
JUDGMENT**

Warden Randy Tate, Respondent, files this supplement to its motion to dismiss the Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 (ECF 12).

As indicated in the amended declaration of Deportation Officer, Kevin Alexis, the Houston, Texas, Field Office of Enforcement and Removal Operations (ERO Houston) removed the Petitioner, Bilal Fawzi Basheer Alhalabi, to Jordan on April 4, 2025. Gov't Ex. 2, Amended Declaration of Deportation Officer Kevin Alexis. Therefore, Petitioner's claim of unlikely removal in the reasonably foreseeable future is moot. Accordingly, the Court should grant Defendants' motion to dismiss (ECF 12) and dismiss the Petitioner's writ of habeas corpus for lack of subject matter jurisdiction.

Dated: April 14, 2025.

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Catina Haynes Perry

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**CERTIFICATE OF SERVICE**

I certify that on April 14, 2025, the foregoing was filed through the Court's CM/ECF system and will be mailed to the *pro se* Petitioner at the following address of record.

Bilal Fawzi Basheer Alhalabi  
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Montgomery Processing Center  
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Conroe, TX 77301

/s/ Catina Haynes Perry  
Catina Haynes Perry  
Assistant United States Attorney