

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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SAAD OSMAN,

Petitioner,

Case No. 25-CV-286

v.

SHERIFF DALE J. SCHMIDT,  
Sheriff Dodge County,

Respondent.

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**CIVIL L. R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION  
FOR LEAVE TO FILE SUR-REPLY**

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Respondent Dale J. Schmidt, by his undersigned attorneys, respectfully moves the Court for leave to file a sur-reply to Petitioner Saad Osman's Petition for Writ of Habeas Corpus no later than March 21, 2025. In support of this motion, Respondent states as follows:

1. On February 26, 2025, petitioner Saad Osman filed a petition for a writ of habeas corpus, along with a Motion for Temporary Restraining Order, seeking his release from custody and to enjoin the Government from removing him from the United States pursuant to a final order of removal. In accordance with the Court's Minute Order, Respondent filed his answer to the petition and motion on March 6, 2025, and Petitioner filed his reply on March 14, 2025.

2. Given the arguments and case law cited in the reply brief, and particularly the allegations of irregularity in the handling of Mr. Osman's application for Temporary Protected Status, the Government would like the opportunity to address those contentions in a sur-reply brief within 7 days of the filing of Petitioner's reply brief, or on March 21, 2025.

3. The undersigned has conferred with counsel for Petitioner, who has authorized me to state that Petitioner does not oppose this request.

Respectfully submitted this 17th day of March 2025.

RICHARD G. FROHLING  
Acting United States Attorney

By: /s/ Chris R. Larsen

CHRIS R. LARSEN  
Assistant United States Attorney  
Wisconsin Bar No.1005336  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 530  
Milwaukee, WI 53202  
Telephone: (414) 297-1700  
Fax: (414) 297-4394  
Chris.Larsen@usdoj.gov