

**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

**PETITIONER'S MOTION TO COMPEL RESPONDENTS
TO RETURN PETITIONER TO THIS DISTRICT**

Petitioner Badar Khan Suri moves this court to order Respondents to return Petitioner to this District and prohibit Respondents from removing Petitioner from the United States pending these proceedings or until the Court issues a contrary order pursuant to the All Writs Act, 28 U.S.C. §1691. In support of this motion, Petitioner submits a memorandum of law, associated exhibits, and a proposed order.

Date: March 20, 2025

Respectfully submitted,

/s/Eden B. Heilman

Eden Heilman, VSB No. 93554

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/s/Hassan Ahmad

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CERTIFICATE OF SERVICE

I, Eden Heilman, hereby certify that on this date, I uploaded a copy of Petitioner's Motion to Compel Respondents to Return Petitioner to this District, the accompanying memorandum of law, and any attachments using the CM/ECF system, which will cause notice to be served electronically to all parties

Date: March 20, 2025

Respectfully submitted,

/s/ Eden B. Heilman

Eden B. Heilman, VSB No 93554

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[PROPOSED] ORDER

For the reasons stated in Petitioner's Motion and Memorandum of Law to Compel Respondent's to Return Petitioner to this District, and for good cause shown therein, it is hereby

ORDERED that Respondents shall transfer Petitioner to this District by _____,
and

ORDERED that Defendants are prohibited from removing Petitioner from the country
pending these proceedings or until the Court issues a contrary order

It is SO ORDERED.

Date: _____

HON. PATRICIA TOLLIVER GILES
UNITED STATES DISTRICT JUDGE