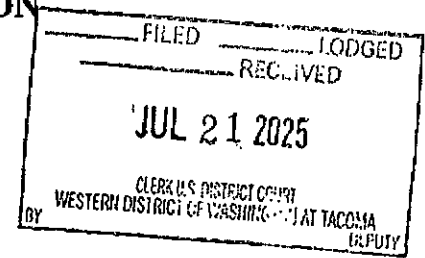


**UNITED STATES DISTRICT COURT
WESTERN COURT OF WASHINGTON
TACOMA DIVISION**



Tareq Ziad Fouad Zakarneh

Petitioner

V.

**United States of Immigration Custom
Enforcement and facility Administrator
of the detention Center**

Respondent

Case # 2:25-cv-00707-GJL

**Motion to garnt an Order to rlease the
Petitioner's legal work of his habeas case
and other related documents
which its at Respondent's Custody as
his property**

The respodent has the custody of Mr.Zakarneh property ,the respondent on June 6,2025 start moving the petitioner around the god's creation at the state without knowledging Mr.Zakarneh that the respondent has the intention to remove him from the country without a prior notification see *Taeq Zakarneh Declaration Ex.A* , just he has been told by the Sergent Johnson from GEO coropration at the detention faciltity that he has been scheduled to be transferd for unknow destination , as Officer Chavez from the

**1| Motion to Garnt an Order to rlease the Petitioner's legal work of his habeas case
and other related documents which its at Respondent's Custody his property**

Immigration Custom enforcement as well told him at the airport that the Heaquarter of Excutive Removal office decide to tranfer him for a different facility , as Mr.Zakarneh asked the officers to have the chanec to call his attorney and call the distrcit court to inform them about the Immigration and custom Enforecement action , with a violation of his constitutional rights the Respondent refuse to give Mr.Zakarneh a phone call to the district court or the to his lawyer which its violation of 5.5 prisoner constittional law to communicate with his attorney and 5.4 prisoner cosntitutional law of communication with the court and violation of his right to use the phone under 5.16 prisoner constittional law as Mr.Zakarneh refuse to leave the facility , but he was forced to be transferred whithout telling him the final destination or the intention of remvng him from the country for unknown destination *see the declartaion of officer Enriqu Rodriquez of the status report EX.B* , Mr.Zakarneh asked after the removal proceeding fail hypothitically after he has been draged to the airports twice at Arizona airport and the Dallas Texas as he decalare a hunger strike at arizona facilty for the non human conditions that he has been left with other immigratnt , then Mr.Zakarneh has been stationed at the Prarire land detention center , Mr.Zakarneh asked to see his prpoerty at the detention center to get acces for his legal work related to his hasbeas case and his NIW application because he has had a deadline of June,19,2025 to respond to the respondant motion to dissmis of his habeas case and to respond to the USCIS for their intention to deny of his NIW application EB2 , after one week of arguing and demaniding with ICE officers officer M.Castillo and ooffice Thompson and the property officer of the Prairie land detention center he has been told that he is moving back to Tacoma,WA by ICE officers as his property will be with their , the tranfer was canceled between June .14,22025 to June .24.2025 after they could not find his property, as the officer from the detention center told him we cant find it which it was not an excuse , which it means that Mr.Zakarneh was in purpose Immigration Custom Enforcement and

- 2| **Motion to Garnt an Order to rlease the Petitioner's legal work of his habeas case and other related documents which its at Respondent's Custody his property**

their detention forces was dragging him around the country by ICE forces to distract his legal work, as the government tried to move him faster after his immigration attorney Eric Welsh got the status report from the district court of

Washington about ICE was trying to remove him while he still in litigation at the Board of Immigration of Appeal as Mr. Eric Welsh called the emergency line of the Board on June 26, 2025 and June 27, 2025 to stop the illegal removal proceeding while Mr. Zakarneh has a motion to stay pending with his motion to reopen and motion to advance proceeding the respondent decided to move Mr. Zakarneh back without giving him his property on early morning at 4:00 AM of June 30, 2025, the Respondent by omission or in purpose took Mr. Zakarneh property and all of his legal work that is related to his federal cases of his Habeas case 2:25-cv-00707-GJL-DGE and his immigration case and hide them in purpose, as his federal FOIA case at the district court of Oregon case 3:25-cv-00448-SB which the US Marshalls did a service for the respondent and the United States Citizenship and Immigration services and John Doe on June 20, 2025 at the headquarter at WA D.C, as the case that he witnessed a medical violation 6.3 for other detainees prisoners at the NW ICE detention center and there was one should be filed on June 30, 2025 Versus Immigration Custom Enforcement and the Facility administrator at the district court in Dallas Texas for overcrowding 8.4 violation of the constitutional prisoners right Prairie land Detention center as Mr. Zakarneh still missing his legal work at the law library of at Prairie land Detention, as his immigration attorney called the two centers on July 2025 to locate his property and his legal work as still not delivered to him, Mr. Zakarneh asking the court to grant him an order respectfully to demand the respondent to release his legal work in their custody that they have been hiding from him since June 6, 2025 to make him able to continue his efforts of relief from custody that has been built on non truthful information

- 3) **Motion to Grant an Order to release the Petitioner's legal work of his habeas case and other related documents which is at Respondent's Custody his property**

and no ethical action which it comes under a False Claims act that has been established by Department of Homeland Security and other agencies since May.22.2024 , as he is asking the court to find the respondent is responsible of an obstruction of justice and grant him the relief that he is suitable to his confinement respectfully, the respondent is ignoring his requests as Just the facility administrator keep him in loop for an update without any action or clear respond from the Immigration Custom Enforcement authorities to keep him in custody for the longest time that they can as an intention to obstruct any relief that he is asking for , which it increase his pain and suffer .

Dated on July,17th, 2025

/s/ Tareq Zakarneh
Tareq Zakarneh ,Petitioner

- 4| Motion to Grant an Order to release the Petitioner's legal work of his habeas case and other related documents which is at Respondent's Custody his property**

EX.A

Declaration Of Tareq Zakarneh

I Tareq Zakarneh declare under penalty perjury that what comes in my motion as a petitioner true and full true ,as I want to confrim until this moment of fgiling y motion to force the respondennt o rlease my legal work and my proepert I did not get any respond from the supervisor of the US immigration and Custom enforcement , as the only respond that I got was from the facility administrator Mr.Bruce Scott who told that he is working about locating my property with the immigration and Custom enforcement supervisor of the facility Mrs Burns , As I already sent many requset letters to the supervisor and the deportation officer Mr.Enrique Rodriquez as they both astop comminicating with me with other ICE officers after I warned them that it has been lost since June.6.2025 and this iswill be considered to be an obstruction of Justice while they did not facilitate any relief in m y favor while I'm already over wait for them to find my preoperty and release it to me , as I want to inform that the decalartion status report from officer Enirique has lies and non truthful inofrmations because I was never ever been prceesed or stationed in Elpaso Processing Center in Texas , I was taken around the god's creatioon through ten flights in painful circumstnces cuffed restricted on planes through the country on June,6,20205 from Seattle airport to California then to Utah then to las vegas then to Arizona in bad circumstances of florence detention center then I have been draged to the airport of Arizona then sending me back to the Florence Detentention Center as I declared a hunger strike and refuse to count as an objection on the bad circumstnces and I had been put in segregation for medical isolation purposes after refused to eat ,then ICE moved me

to Alvarado Texas which two days in front desk office without informing me about anything or getting any phone calls to my lawyer or the court then I was taken to Dallas airport for alleged deportation on June,12,2025 which it stopped at the door of the airplane and I have been informed that maybe we don't have a travel document for you as we can't deport you for a country you don't belong to , while I argued with ICE negotiator for me and other Palestinians from Gaza Strip how you are deporting me while I'm still in litigation and I have motion to stay pending at the Board Of Immigration of Appeal and it an imminent motion , by officer M.Klein with employees # 6885 state I don't have too much authority to tell you , as I argued with him with the Statue for Palestinian Executive order 89FED REG 12743 that is a violation of my other people who is from Gaza Strip and West bank as I informed him this is an attempt of murder the country in severe war , as I did not see my property at all and my legal documents at all through all of these trips around the country ,as I have been told that my property and my legal work is on the airplane with me which I did not see at all as I have been told at Prairie Land detention Center when I asked to get access to my thumb drive and my legal work between June.6.2025 to June.25.2025 that we can't locate yet which it was a night mare for me because I had two deadlines which it pass due now with the USCIS and the District court .

Executed at Tacoma,WA dated , July, 17, 2025.

/s/ Tareq Zakarneh

Eng.Tareq Zakarneh
1623 East J Street
Tacoma,WA 98421

3| Declaration Of Tareq Zakarneh

EX.B

Chief District Judge David G. Estudillo
Magistrate Judge Grady J. Leupold

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TAREQ ZIAD FOUAD ZAKARNEH,

Petitioner,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, *et al.*,

Respondents.

Case No. 2:25-cv-00707-DGE-GJL

FEDERAL RESPONDENT'S
STATUS UPDATE

Pursuant to this Court's Order (Dkt. No. 16), Federal Respondent U.S. Immigration and Customs Enforcement ("ICE") provides this status update concerning Petitioner Tareq Ziad Fouad Zakarneh's detention status. On or about June 6, 2025, ICE transferred Petitioner to another ICE facility in preparation for removal. Supplemental Declaration of Enrique Rodriguez, ¶¶ 4, 5. Although a previously scheduled removal flight was cancelled (*Id.*, ¶ 6), there is a significant likelihood of Petitioner's removal to be scheduled in the foreseeable future. *Id.*, ¶ 9. Petitioner is being detained at the El Paso Service Processing Center in El Paso, Texas, awaiting a removal flight. *Id.*, ¶¶ 7, 8.

//

//

FEDERAL RESPONDENT'S STATUS UPDATE
[Case No. 2:25-cv-00707-DGE-GJL] - I

UNITED STATES ATTORNEY
1201 PACIFIC AVE., STE. 700
TACOMA, WA 98402
(253) 428-3800

1 DATED this 17th day of June, 2025.

2 Respectfully submitted,

3 TEAL LUTHY MILLER
4 Acting United States Attorney

5 s/ Michelle R. Lambert
6 MICHELLE R. LAMBERT, NYS #4666657
7 Assistant United States Attorney
8 United States Attorney's Office
9 Western District of Washington
10 1201 Pacific Ave., Ste. 700
11 Tacoma, WA 98402
12 Phone: (253) 428-3800
13 Fax: (253) 428-3826
14 Email: michelle.lambert@usdoj.gov

15 *Attorneys for Federal Respondent*

Chief District Judge David G. Esundillo
Magistrate Judge Grady J. Leupold

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA.

TAREQ ZIAD FOUAD ZAKARNEH,

Petitioner,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, *et al.*,

Respondents.

Case No. 2:25-cv-707-DGE-GJL

SUPPLEMENTAL DECLARATION
OF ENRIQUE RODRIGUEZ

Noted for consideration on:
June 26, 2025

I, Enrique Rodriguez, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer employed by the United States Department of Homeland Security ("DHS"), United States Immigration and Customs Enforcement ("ICE"), Office of Enforcement and Removal Operations ("ERO"). I am currently assigned to the ERO office at the Northwest ICE Processing Center ("NWIPC") in Tacoma, Washington.

2. I am familiar with the case of Tareq Zakarneh ("Petitioner"). I make this declaration based upon my personal and professional knowledge, obtained from various records and systems maintained by ICE in the regular course of business. I provide this declaration based on the best of my knowledge, information, belief, and reasonable inquiry in the above-captioned case.

SUPPLEMENTAL DECLARATION
OF ENRIQUE RODRIGUEZ
[Case No. 25-cv-707-DGE-GJL]

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify on today's date, I electronically filed the foregoing with the Supplemental Declaration of Enrique Rodriguez with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

- 0 -

I further certify on today's date, I arranged for service of the foregoing on the following non-CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as follows:

Tareq Ziad Fouad Zakarneh, *Pro Se* Petitioner
A# [REDACTED]
NW ICE Processing Center
1623 E. J Street, Suite 5
Tacoma, WA 98421-1615

DATED this 17th day of June, 2025.

s/ Stephanie Huerta-Ramirez
STEPHANIE HUERTA-RAMIREZ, Legal Assistant
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, WA 98101
Phone: (206) 553-7970
Fax: (206) 553-4073
Email: Stephanie.Huerta-Ramirez@usdoj.gov

1 3. On or about June 4, 2025, I was notified that DHS was able to obtain a removal flight for
2 Petitioner which was scheduled for June 12, 2025.

3 4. On or about June 6, 2025, Petitioner was scheduled for transfer to the Florence Staging
4 Facility in Arizona in preparation for the removal flight.

5 5. On June 7, 2025, Petitioner was booked into the Florence Staging Facility in Arizona in
6 preparation for the removal flight.

7 6. On or about June 8, 2025, Petitioner's removal flight was cancelled due to logistical
8 issues with the flight.

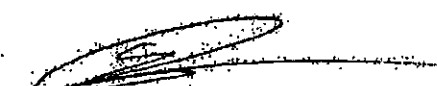
9 7. On June 10, 2025, Petitioner was transferred to the El Paso Service Processing Center in
10 El Paso, Texas, to await a removal flight.

11 8. Petitioner is currently detained in DHS custody at the El Paso Service Processing Center.

12 9. Currently available information indicates that there is a significant likelihood of a
13 removal flight for Petitioner to be scheduled in the foreseeable future.
14
15
16
17
18

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed at Tacoma, Washington, dated June 16, 2025.

21 
22 Enrique Rodriguez
23 Deportation Officer
24 United States Department of Homeland Security
25 United States Immigration and Customs Enforcement
26 Tacoma, Washington
27

UNITED STATES DISTRICT COURT
WESTERN COURT OF WASHINGTON
TACOMA DIVISION

Tareq Ziad Fouad Zakarneh

Petitioner

V.

**United States of Immigration Custom
Enforcement and facility Administrator
of the detention Center**

Respondent

Case # 2:25-cv-00707-GJL

CERTIFICATE OF SERVICE

I certify that I served the respondent attorney the attached motion on the address below for the best of my knowledge after the respondent who has custody on the petitioner property dismantle all of his legal work , as still refuse respond to his request about his

missing property and his legal work versus the respondent in the district court and the immigration court :-

Michelle Lambert
United States Attorney Office
Western Of Washignton
1201 Pacific Ave ., ste 700
Tacoma,WA 98402

Dated on July,17th, 2025

/s/ Tareq Zakarneh
Tareq Zakarneh ,Petitioner