

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

**MOTION TO DISCLOSE A
DISCOVERY RULE Under RULE (26)
and Rule (6)**

The discovery is coming under civil rule .26 and Rule .6 in favor of Mr. Zakarneh who is the petitioner, The respondent in his supported declaration for their motion to dismiss by their officer Mr. Enrique Rodriquez claim under penalty and perjury that Mr. Zakarneh

MOTION TO DISCLOSE A DISCOVERY RULE Under RULE (26)

claims that he has a Jordanian nationality which it is not true *see EX.A Point 35 of Enrique Rodriguez Declaration's*, the petitioner asking the court to grant him an order to make the respondent disclose the discovery is alleging when Mr. Zakarneh claim that he is a Jordanian and where? as the government was alleged through their officer too that the communication with Israel to deport him based Israel is his home nation and after they accuse him of belonging to terrorist organizations in Palestinian Territories and Jordan which it was lies has been established at the respondent brain to hurt the petitioner, the respondent send a message to officer Rodriguez to provide him the communication and the emails and letters between the State department and the Israeli government responds based on officer Enrique declaration *see EX.A Point point 27 and point 33 of Enrique Rodriguez Declaration's*, officer Rodriguez respond back to Mr. Zakarneh on electronic message on June.6.2025 that the alien been released from their custody which it was not true , the respondent present a redacted reports from the Department Homeland Security and the FBI that they have an anonymous witness state that Mr.Zakarneh belongs to a terrorist organization at the Palestinian Territories as the Petitioner asking the court respectfully to grant him an order to force the respondent to release the original reports from the Federal Bureau Investigation and the Homeland security Investigation without redaction *see EX.B redacted FBI and HSI reports*, the Judge John Odell on February,4,2025 refuse to issue an order to release Mr. Zakarneh based on these redacted reports from the respondent which it was violation of the civil law of rule 5(2)(b) as the respondent alleged that Mr.Zakarneh is a danger for the community and the immigration judge consider the NON valid evidence is a valid evidence, for these reasons that has been mentioned petitioner asking the court to grant him a discovery, as they alleged the same information versus the petitioner at the Board Immigration of Appeal on Feb,7,2025 to deny his motion to stay and his motion to reopen with his asylum application while his original home at Palestinian territories is going under an excessive continuous war since 1948.

The petitioner asking the court respectfully the court to grant him an order to release the discovery that he is entitled to.

Dated of August, 14, 2025

/s/ Tareq Zakarneh
Tareq Zakarneh, Petitioner

EX.A

1 Chief District Judge David G. Estudillo
2 Magistrate Judge Grady J. Leupold
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 TAREQ ZIAD FOUAD ZAKARNEH,
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Petitioner,

v.

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

14 Respondents.

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

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DECLARATION OF ENRIQUE RODRIGUEZ
[Case No. 2:25-cv-00707-DGE-GJL] - 1

UNITED STATES ATTORNEY
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TACOMA, WA 98402
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U.S. Department of Homeland Security
Immigration and Customs Enforcement
Enforcement and Removal Operations
Northwest ICE Processing Center
1623 E J Street
Tacoma, Washington 98421

I, Enrique Rodriguez, being first duly sworn, do depose and say:

- 1) I am currently employed as a Deportation Officer with Department of Homeland Security, United States Immigration & Customs Enforcement (ICE), formerly the Immigration and Naturalization Service (INS). I have been employed by ICE since August 25, 2024.
- 2) As a Deportation Officer, I am a federal law enforcement agent and I have had direct experience with federal violations of immigration law and related investigations. I have received extensive training and practical experience pertaining to federal criminal procedures, federal criminal statutes, U.S. Immigration laws and regulations, and other federal laws including Illegal Reentry, pursuant to Title 8, United States Code § 1326(a)(1) and (b)(1).
- 3) I have reviewed ICE's records regarding Tareq Ziad Fouad Zakarneh, A [REDACTED] including ICE's attempts to execute his removal order. Zakarneh is currently detained in ICE custody at the Northwest ICE Processing Center in Tacoma, Washington.
- 4) On December 14, 2016, removal proceedings were initiated.
- 5) On July 15, 2019, all relief was denied by the immigration judge and Zakarneh was granted Voluntary Departure (VD) until September 13, 2019.
- 6) On August 13, 2019, Zakarneh filed an appeal with the Board of Immigration Appeals (BIA).
- 7) On August 29, 2022, the BIA dismissed Zakarneh's appeal and reinstated the VD time period to October 28, 2022.
- 8) On September 27, 2022, Zakarneh filed a Petition for Review (PFR) with the Ninth Circuit Court of Appeals with an accompanying motion for stay of removal.
- 9) On November 15, 2022, a temporary stay of removal was granted.
- 10) On July 26, 2023, the stay of removal was lifted upon motion by the government.
- 11) On September 27, 2023, ICE contacted Zakarneh by phone to order him to report and assist in seeking travel documents for removal. Zakarneh did not report as ordered.
- 12) Travel documents are typically required for ICE to execute a removal order. Examples

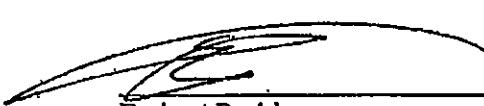
are a valid passport, birth certificate, or similar document that establishes an alien's identity and nationality.

- 13) On October 26, 2023, a motion for stay of removal was filed by Zakarneh.
- 14) On November 13, 2023, the motion for stay of removal was denied.
- 15) On December 11, 2023, a motion for stay of removal was filed by Zakarneh.
- 16) On January 24, 2024, the motion for stay of removal was denied.
- 17) On May 22, 2024, Zakarneh was taken into ICE custody due to his failure to report to ICE and assist in obtaining travel documents.
- 18) On August 1, 2024, ICE obtained Zakarneh's expired Palestinian passport (expired July 10, 2020).
- 19) On September 30, 2024, Zakarneh was determined to be a "Failure to Comply" which means that he refused to comply with ICE's efforts to obtain travel documents.
- 20) On October 23, 2024, Zakarneh continued to refuse to comply with ICE's efforts to obtain travel documents.
- 21) On October 30, 2024, Zakarneh continued to refuse to comply with ICE's efforts to obtain travel documents.
- 22) On November 6, 2024, a motion for stay of removal was filed by Zakarneh.
- 23) On November 19, 2024, Zakarneh continued to refuse to comply with ICE's efforts to obtain travel documents and was served a formal notice of his failure to comply.
- 24) On December 5, 2024, the motion for stay of removal was granted pending issuance of the mandate from the Ninth Circuit Court of Appeals.
- 25) On January 31, 2025, due to Zakarneh's refusal to comply with ICE's efforts to obtain travel documents, ICE sought permission from Israel to permit entry into the West Bank utilizing Zakarneh's expired passport.
- 26) On February 26, 2025, the PFR was denied.
- 27) On March 2025, ICE sought follow-up information regarding the request to Israel permit entry into the West Bank utilizing Zakarneh's expired passport. There was no update available at that time.
- 28) On April 16, 2025, a motion for panel rehearing was filed by Zakarneh.
- 29) On April 18, 2025, the motion for panel rehearing was denied.
- 30) On April 21, 2025 ICE sought follow-up information regarding the request to Israel to permit entry into the West Bank utilizing Zakarneh's expired passport. There was no

update available at that time.

- 31) On April 28, 2025, the mandate issued.
- 32) On April 28, 2025, a motion for rehearing en banc was filed by Zakarneh.
- 33) The United States Department of State (DOS) continues to assist ICE in seeking permission for Zakarneh to enter the West Bank on an expired passport so that his removal order can be executed.
- 34) Zakarneh's refusal to comply with ICE's efforts has severely delayed the execution of his removal order. If Zakarneh was willing to comply with ICE's efforts to obtain travel documents, he would have a significant likelihood of being removed from the United States in the reasonably foreseeable future.
- 35) Zakarneh also claims to be a national of Jordan. ICE has been unable to further investigate the potential of removal to Jordan due to Zakarneh's refusal to comply with ICE's efforts to obtain travel documents.
- 36) Despite Zakarneh's refusals to comply with ICE's efforts to obtain travel documents, ICE believes there is a realistic possibility of being able to execute Zakarneh's removal order.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct. Dated this 29 day of May, 2025.



Enrique Rodriguez
Deportation Officer
Immigration and Customs Enforcement
U.S. Department of Homeland Security