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

TAREQ ZIAD FOUAD ZAKARNEH

Petitioner,

V.

**IMMIGRATION CUSTOM ENFORCEMENT
ET AL,**

Respondent,

Case No . 2:25-cv00707-DGE - GJL

**MOTION TO GRANT AN ORDER TO
RECOVER LEGAL WORK THE PNY THUMB
DRIVE No.162 on 8.26.2025 OR COMPUTER
WITH SERVICE TAG 2GXQ2G3 AT THE
LAW LIBRARY BY AN INDEPENDENT
RECOVERY COMPANY**

The respondent on August,26,2025 destroyed at the detention center of NW ICE processing center the petitioner legal works in retaliatory purpose or by omission , the respondent asked the petitioner to remove his legal work from the thumb drive PNY No.162 to another NON brand thumb drive, the petitioner object on the new one because it was not branded and it was hard to work and slow with the computer and he warned the law library officer Man about it it will break its a cheap made , the law library officer indicate to him you we are going to stop using the PNY 8 GB thumb drive No.162

**1| MOTION TO GRANT AN ORDER TO RECOVER THE PNY THUMB DRIVE
No.162 AT THE DATE RANGE**

because our IT department want you to move your legal work to the NON branded one or you will lose your legal work if you don't move it, the petitioner warned the officer that this thumb drive will fail and he has good experience with it as a service engineer , the petitioner did technical move by moving the information to the computer with service tag [REDACTED] and service code [REDACTED] from the PNY thumb drive No.162 then move his legal work to the NON branded cheap Chinese make thumb drive with No.162 , the next day of August ,27,2025 the petitioner could not access his legal work at the Law library and all of his legal work since has been detained on May,22,2024 is gone and the files was corrupted, as he was able to recover his legal work and his property after two months of fighting and arguing with the defendant and he filed a motion with district court under his habeas case on July,18,2025 and its detention facility administration, On August ,25,2025 when the Warden got his property back from ICE after ICE invade his property and [REDACTED]

[REDACTED]



violation of the Fourth and the Fourteen amendment without the petitioner authorization OR permission, as the petitioner filed a claim with the district court for the respondent violations *see 3:25-cv-5730 -RSM*, the petitioner has Mr.Juan Ortega witness the incident with him *see Juan Ortega declaration Ex.A*, the petitioner asked the respondent to recover the information from the PNY thumb drive No.162 or from the computer, as the respondent IT person Mr.Singh deny he will be capable of doing that as he claims that is Mr.Zakarnah mistake and he did not have any information on his old thumb drive and the new one which it destroyed his information as sergeant Johnson suggest to check the petitioner property to see if the

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2| **MOTION TO GRANT AN ORDER TO RECOVER THE PNY THUMB DRIVE
No.162 AT THE DATE RANGE**

defendant copy his legal work before moving his around the gods creation on June ,6,2025 to deport him illegally with a violation of his 24 hour notice see *A.A.R.P v. Trump* ,145 S.Ct.1364, as the defendant refused to send the PNY thumb drive or the Computer to a recovery company to recover the information while the petitioner did not erase them from the Thumb drive PNY No.162 or the computer just he moved them to the computer then to the new bad thumb drive to leave the door open if the bad qulaity thumb 162 will fail , and he asked the respondent to give it to him as a property then he can handle it through a technical company , then he can send it outside to a friend and mail it to a recovery company while he is not responsible about their mistakes and they should be held responsible about their mistakes or provide him with a supplies to recover his information or send the thumb drive for a third party recovery company can recover his legal work as the respondent refused under security protocol, the petitioner asking the court to grant him an order forcing the respondent to hire a recovery company to recover his legal work from the PNY thumb drive No.162 or from the computer of the law library with service tag  and service code  which it was placed on the desktop of the mentioned computer, as all of his legal work for his habeas case will be lost if they did not save a spare copy for him, as an obstruction of justice they do not collaborate with him to check everything on time while he has a deadline with the ninth circuit on September,11,2025, and the petitioner informed them about it through the electronic messages as they did not allow him a phone call to his bank to recover his credit cards accounts or a computer access to his bank account while this is a detention center not a prison, and they should be held responsible about his attorney fees to solve this issue, because destroying his

**3| MOTION TO GRANT AN ORDER TO RECOVER THE PNY THUMB DRIVE
No.162 AT THE DATE RANGE**

legal work under three federal cases and his immigration case is a retaliatory action from the defendant to make him give up his rights in favor of the respondent.

This dated on September.2.2025

/s/Tareq Zakarneh

Tareq Zakarneh, Petitioner

EX.A

**5| MOTION TO GRANT AN ORDER TO RECOVER THE PNY THUMB DRIVE
No.162 AT THE DATE RANGE**

Declaration of Juan Ortega

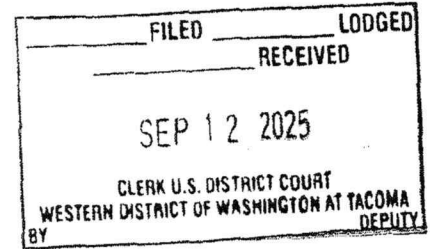
I Juan Ortega witnessed the incident that happen with Mr.Tareq Zakarneh on August ,27,2025 , the law library officer Man hand a new USB to move his information from a PNY 8 GB thumb drive to a non brand metal thumb drive, Mr.Zakarneh complain that the new thumb drive will not work and its not branded and he has experiece with them that they break so fast and he will lose the information, the officer insist that he needs to move his files from the PNY thumb drive to non branded one, Mr.Zakarneh as an engineer did a spare step by not deleting his files from the PNY thumb drive and he moved the files to the desktop of the computer then moved the files to the new thumb drive carefully in case the new one will not work later on and they will be able to recover them from the old one, next day on August,27,2025 when I went with him to library to finish some work the new USB did not work at all and all of his files was corrupted and he was not able to access it, he asked the officer in charge to find a solution and allow a recovery software to recover his information from the computer or the old thumb drive as they argue the IT will fix it on August, 28,2025 they told him you lost your information and you are responsible about it not we which it was not true Mr.Zakarneh warned them about it before he moved his information based on their request and orders as when he argue with them about their violation they answered him by officer Man and sergeant Johnson he will not be able to come to library if you keep complaining about it, I can see the library people represented by GEO and DHS does not like to see Mr.Zakarneh helping other people to get been released or get their legal work done or any work he is doing against their violations and they are responsible about destroying his file at the USB because they are the party who provides a cheap product without care and testing methods, its our efforts and time

consuming and the pain and suffer that we are going through to do our legal works, as I'm ready to testify in front of the court for this incident if I have been asked to testify.

Dated on August, 28,2025.


/s/ **Juan Ortega**

1623 East. J street
Tacoma, WA 98421



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

TAREQ ZIAD FOUAD ZAKARNEH

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

Petitioner,

v.

Certificate of Service

**IMMIGRATION CUSTOM ENFORCEMENT
ET AL,**

Respondent,

I Tareq Zakarneh hereby certify that on September,4,2025 that I served the respondent the motion to grant an order to recover my legal work on the thumb PNY No.162 on August .26.2025 or on the computer with service tag 2GXQ2G3 with service code 5377667043 at the law library on the address below by the first class mail :

United States Attorney
1201 Pacific Ave ,ste 700
Tacoma, WA 98402
This dated on September,4,2025

/s/ Tareq Zakarneh
Tareq Zakarneh, Petitioner