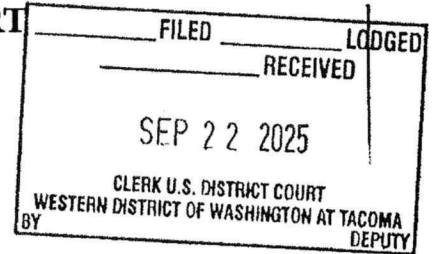


UNITED STATES DISTRICT COURT
WESTERN OF WASHINGTON
TACOMA DIVISION



TAREQ ZIAD FOUAD ZAKARNEH

Petitioner,


v.


IMMIGRATION CUSTOM ENFORCEMENT
ET AL,

Respondent,

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

Reply to the respondent opposition to
Produce a discovery

The respondent object to disclose a discovery is essentially behind keeping Mr.Zakarneh behind bars and bar him from any relief, see the BIA order to deny his petition to reopen under an asylum relief on August,12,2025 after the DHS present these redacted doctorate reports to the BIA and the BIA decide that Zakarneh is barred falsely from asylum because he has been 

 see EX.A BIA decision ,the DHS respond to Zakarneh attorney of a motion to reopen see EX.A, if Zakarneh relief was granted Zakarneh can restate his green card under the immigration law 8 C.F.R 264.5(g) under agency proceeding while they refused under federal proceeding with a

1| Reply to the Respondent opposition to Produce a Discovery

granted motion to stay from the ninth circuit, but the respondent present the redacted reports of [REDACTED]

[REDACTED] to defame Mr. Zakarneh as [REDACTED]
[REDACTED]

is tryin to show Zakaneh as *Bracy v. Gramley* , 520 U.S 2241 which it dosnot apply, it comes under an affiliation between the Department of Homeland Security and the Department of justice, the discovery is obligatory when the petitioner has a show cause why the discovery must be produced after the BIA decision of denying his motion to reopen with an asylum application is a good cause to grant an order for producing a discovery for the petitioner to subpoena the officers and their witness in evidentiary hearing and for unlawful detention, Zakarneh is not just entitled for discovery of [REDACTED] redacted doctorate reports Zakarneh is entitled for discovery for [REDACTED] why Zakarneh was asked to be deported for a country that he does not belong to and his original home is occupied by their forces , Zakarneh has a stateless status as a native of Palestine as the show cause that the government use to deport him to Israel after [REDACTED]

[REDACTED]


Jordan while he never ever has been a Jordanian citizen, the detention for Zakarneh is Invalid under 8 U.S.C 1231(a)(6) because the final order now according to the DHS is August ,12,2025 from the BIA and the show cause for denying his motion to reopen was based on redacted reports from [REDACTED]

[REDACTED]

2| Reply to the Respondent opposition to Produce a Discovery

Organization at the Palestinian territories or in another country which nothing of these redacted doctorate alleged documents is true, the government alleging that Mr.Zakarneh is detained under 8 USC 1231(a)(6) which it does not apply on Mr.Zakarneh anymore for these reasons:-

1- The government did not produce and comply with Mr.Zakarnh to produce evidence according to his green card interviews and 233 pages has been whited out before the BIA order on August,29.2022 or the Ninth circuit February,26, ,2025.

2- The BIA on August, 12,2025 refused to reopen his case based on a redacted and doctorate reports from  which its a violation of the administrative procedure act, with an asylum application under country change conditions

3- The DOJ and the DHS are the government as the DOJ is representing the DHS versus Zakarneh in two civil cases at the district court of Portland, Oregon and Washington.

a- Freedom of act case No. 3:25-cv-00448-SB.

b- Habeas case No. 2:25-cv-00707-DGE-GJL.

Zakareneh qualify for Cancellation of removal and adjustment of status under § 8 USC 1229b.

(a) Cancellation of removal for certain permanent residents. The Attorney General may cancel removal in the case of an alien who is inadmissible or deportable from the United States if the alien--

(1) has been an alien lawfully admitted for permanent residence for not less than 5 years,

(2) has resided in the United States continuously for 7 years after having been admitted in any status, and

(3) has not been convicted of any aggravated felony.

3| Reply to the Respondent opposition to Produce a Discovery

Zakarneh appealed the decision from BIA agency to the Ninth circuit on September,9,2025 by mail service and the Plaintiff filed a complaint at the district court at the district of Oregon on September,10,2025.

Zakarneh is entitled for any conversation between the state department and any other to know [REDACTED] as a danger person in retaliation from him.

For these reasons and show cause the court should grant Mr. Zakarneh discovery to allow Mr.Zakarneh to persecute and examine the government in evidentiary hearing , [REDACTED]

This dated on September ,7,2025

/s/ Tareq Zakarneh

Tareq Zakarneh,Petitioner

EX.A



U.S. Department of Justice

Executive Office for Immigration Review

Board of Immigration Appeals

Office of the Clerk

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041

FOUAD ZAKARNEH, TAREQ ZIAD



ICE ERO TACOMA, WA

1623 E J ST

STE 2

TACOMA WA 98421

DHS/ICE Office of Chief Counsel - POO

1220 SW Third Avenue, Suite 300

Portland OR 97204

Name: FOUAD ZAKARNEH, TAREQ ZIA 

Date of this Notice: 8/12/2025

Enclosed is a copy of the Board's decision in the above-referenced case. This copy is being provided to you as a courtesy. Your attorney or representative has been served with this decision pursuant to 8 C.F.R. § 1292.5(a). If the attached decision orders that you be removed from the United States or affirms an Immigration Judge's decision ordering that you be removed, any petition for review of the attached decision must be filed with and received by the appropriate court of appeals within 30 days of the date of the decision.

Sincerely,

A handwritten signature in black ink that reads "John Seiler".

John Seiler
Acting Chief Clerk

Enclosure

User team: Docket

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(503) 326-2059

DETAINED

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS**

In the Matter of:)
)
)

ZAKARNEH, TAREQ)
)
)

In removal proceedings)
)
_____)

File Nos.:



**DEPARTMENT OF HOMELAND SECURITY
OPPOSITION TO MOTION TO REOPEN**

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