

Nur Sheikh-Elmi

A [REDACTED]

Northwest Detention Center

1623 East J Street

Tacoma, WA 98421

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NUR SHEIKH-ELMI, (A# [REDACTED]),) Case No. 2:25-cv-00850-JNW
by HALIMA MAGAN WARSAME, his)
mother and Next Friend)

Petitioner,

**EMERGENCY MOTION FOR PRELIMINARY
INJUNCTION**

v.

PAMELA BONDI, et al

Respondents.

Petitioner, Nur Sheikh-Elmi, by and through his mother and Next Friend, Halima

Magan Warsame, hereby moves this Court for an Emergency Preliminary Injunction enjoining

Respondents from removing him from the United States without disclosing the intended

country of removal and verifying the validity of the travel document being used. In support of

this motion, Petitioner states as follows: 1. ICE officers informed petitioner that he would be

removed from the United States within two weeks, yet the intended country of removal has not
been disclosed.

2. Petitioner is not a citizen of Kenya, and the Kenyan Ministry of Interior has confirmed in
writing that he is not a Kenyan national and cannot legally reside there.

1 3. Forcing him to a country where he has no legal status would violate due process and place
2 him in imminent danger of persecution, statelessness, and human rights violations.

3 4. Petitioner is entitled to judicial review before removal to an unknown destination or to a
4 country where he is stateless. Removal without notification of the country and validation of
5 travel documents is unlawful.

6 5. Petitioner seeks a preliminary injunction preventing his removal until:

7 a. The intended country of removal is disclosed in writing;

8 b. A valid travel document is presented;

9 c. The Court reviews the legality of the removal to that destination.

10 WHEREFORE, Petitioner respectfully requests that this Court GRANT this motion and order
11 Respondents to halt any removal of the petitioner until these requirements are met.

12 Dated this ____ day of _____, 2025.

13 Halima

14 Halima Magan Warsame

15 Petitioner and Next Friend for Nur Sheikh-Elmi

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