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MAY 14 2025

RE

BY AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

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]),
by HALIMA MAGAN WARSAME, his
mother and Next Friend

Petitioner,

v.

PAMELA BONDI, et al

Respondents.

) Case No. 2:25-cv-00850-JNW

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**MOTION TO RECONSIDER AND
EXTEND TEMPORARY RESTRAINING
ORDER**

COMES NOW, Halima Magan Warsame, the mother and Next Friend of Petitioner Nur Sheikh-Elmi, and respectfully requests that the Court reconsider and extend the Temporary Restraining Order (TRO) that was issued on May 13, 2025, and is currently set to expire on May 20, 2025.

Petitioner suffers from severe mental illness and is detained at the Northwest ICE Processing Center. On May 9, 2025, ICE attempted to deport him, but the flight was cancelled, and he was returned to detention. If the TRO expires, ICE is expected to attempt removal again at the first opportunity, putting Nur at imminent risk of deportation while his TPS appeal is still pending.

1 The Court's order provides 21 days to secure counsel. However, if the TRO is not
2 extended beyond May 20, 2025, the purpose of the order, giving time to secure
3 representation will be defeated. I am actively seeking counsel and have submitted a
4 Motion for Appointment of Pro Bono Counsel. I have also submitted the correct in
forma pauperis form and supporting documentation.

5 Due to my location in Minnesota, I experience approximately a one-week delay in
6 receiving documents from the Court or ICE. As of today, May 14, 2025, I have not
7 received ICE's response to the TRO. Given these logistical barriers and the urgent
8 threat of removal, I respectfully request that the Court reconsider and extend the
TRO to maintain the status quo and protect the Petitioner until counsel is appointed
or a further order is issued.

9
10 Respectfully submitted,
Halima Magan Warsame

11 Dated: May 14, 2025

SIGNATURE:

HA1M9

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13 Halima Magan Warsame
14 Petitioner and Next Friend for Nur Sheikh-Elmi
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15 Minneapolis, MN 55406
16 Phone: 612-203-4848
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