

1 Nur Sheikh-Elmi

2 A [REDACTED]

Northwest Detention Center

1623 East J Street

3 Tacoma, WA 98421

FILED
LODGED

ENTERED
RECEIVED

MAY 14 2025

RE

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

BY DEPUTY

5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

7 NUR SHEIKH-ELMI, (A# [REDACTED]),)

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

9 Petitioner,)

10 v.)

11 PAMELA BONDI, et al)

12 Respondents.)

)CASE NO. 2:25-cv-00850-JNW

)APPLICATION FOR COURT-APPOINTED

)COUNSEL

)(Date of 21st day after date of filing)

)June 3, 2025

13
14 MOTION

15 Plaintiff respectfully requests that the Court appoint counsel to represent
16 him. This action seeks relief under federal statutes protecting civil rights.
17 This is not, however, an employment discrimination action brought under
18 Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e et seq.

17 FINANCIAL AFFIDAVIT

18 Has this Court previously granted you leave to proceed in forma pauperis in
19 this case? Yes, I previously filed an incorrect application to proceed in forma

1 pauperis. I received the correct form yesterday, completed it, and mailed it to
2 the Court today.

3 **PREVIOUS EFFORTS TO RETAIN AN ATTORNEY**

4 About a month ago, I contacted multiple legal organizations, including the
5 Northwest Immigrant Rights Project (NWIRP), and Cair, when I was seeking
6 help to file the habeas petition and injunction for the petitioner, Nur
7 Sheikh-Elmi. The petitioner also contacted them directly. We were informed
8 that NWIRP was short on attorneys and could not say how long it would take
9 for someone to assist. That was the reason I filed for him as a pro se Next
10 Friend. I also contacted them today and they still stated the same reason.

11 I cannot afford to hire a private attorney because I receive only
12 Supplemental Security Income (SSI). Previously, my daughter, Ifrah Sheikh
13 Elmi, helped pay for Nur's legal representation, but she is now experiencing
14 financial hardship and is still struggling to pay his prior legal fees. I have no
15 other means of securing legal counsel.

16 **MERITS OF CLAIM**

17 Has the Washington State Human Rights Commission, or other state or
18 federal agency officially determined whether there is reasonable cause to
19 believe that the allegations of your complaint are true?

Answer: No.

Brief Statement Showing Why the Claim Has Merit:

16 Petitioner Nur Sheikh-Elmi is detained by ICE and at imminent risk of
17 deportation while his TPS appeal is still pending. He suffers from severe
18 mental illness and was already taken by ICE for deportation on May 9, 2025,
19 but was returned only because the flight was cancelled. ICE is likely to
attempt deportation again as soon as the current Temporary Restraining

1 Order (TRO) expires. This case involves complex constitutional and
2 immigration issues, including due process rights and access to medical and
3 legal protection. Nur is mentally unfit to represent himself, and I am acting in
good faith on his behalf to protect his rights.

4 AFFIDAVIT OF SERVICE

5 PARTY

ATTORNEY

6 PARTY: Northwest ICE Processing
7 Center

Michelle Lambert

8 Pamela Bondi
9

10 I, Halima Magan Warsame, next friend in this action, swear that I have read
11 this entire Application, including any attachments, and the Complaint. In
12 accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the
foregoing information is true and correct.

13 Executed on this 14 day of May, 2025.

14 Signature : Halima

15
16 Halima Magan Warsame
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