
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Nadeem Khalid,

**PETITIONER'S CONSENT MOTION
FOR LEAVE TO FILE RESPONSE TO
RESPONDENTS' RESPONSE TO
ORDER TO SHOW CAUSE**

Petitioner,

Case No: 25-cv-2183-NEB/DLM

v.

Pam BONDI, Attorney General of the United States,

Kristi NOEM, Secretary of the Department of Homeland Security,

Todd LYONS, Director of Immigration and Customs Enforcement,

Kenneth GENALO, Acting Executive Associate Director, Enforcement and
Removal Operations

Joel BROTT, Sherif of Sherburne County,

Respondents

PLAINTIFF'S CONSENT MOTION FOR LEAVE TO FILE RESPONSE

Petitioner respectfully moves the Court to allow him leave to file a response to the Respondents' July 11, 2025 response to the Court's Order to Show Cause. Petitioner proposes that he be granted leave to file a response by August 1, 2025. New facts have developed, for example the facts referenced by Respondents in their Response on June 23, 2025, and Petitioner would like the opportunity to provide the Court with his perspective on the events of that day.

Counsel for Plaintiff has communicated with Counsel for Respondents, and Counsel for Respondent indicated that they do not oppose Petitioner filing an additional response. Counsel for Respondent indicated that they would also like the opportunity to respond again.

Good cause supports this motion as it would allow Petitioner to provide his perspective on new facts including his view of what happened on June 23, 2025 when Respondents tried to remove him from the United States.

Dated: July 30, 2025

/s/ Graham Ojala-Barbour /s/
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