

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 25-CV-2183 (NEB/DLM)

Nadeem KHALID,

Petitioner,

v.

**CONSENT MOTION TO FILE
SUPPLEMENTAL DECLARATION
AND EXHIBITS**

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;
and Joel Brott, Sheriff of Sherburne
County,

Respondents.

Respondents (1) Pam Bondi, Attorney General of the United States; (2) Kristi Noem, Secretary, Department of Homeland Security; (3) Todd Lyons, Acting Director, Immigration and Customs Enforcement; and (4) Kenneth Genalo, Acting Executive Associate Director of Enforcement and Removal Operations, (collectively, the “Federal Respondents”), with the consent of Petitioner’s counsel, move for leave to file a supplemental declaration and exhibits providing recent developments in this matter by August 8, 2025.

Good cause supports granting the extension. Counsel for the parties met and conferred via phone on August 5, 2025, and agree that a supplemental declaration is appropriate in light of, among other things, recent developments regarding Mr. Khalid’s

detention status and the Federal Respondents' efforts to remove Mr. Khalid. Additionally, Petitioner's request (ECF No. 14) to file a reply to the Federal Respondents' most recent filing indicated that they would likely seek leave to file a supplemental submission.

The Federal Respondents, therefore, respectfully request that the Court enter the proposed order filed contemporaneously with this consent motion, allowing them up to and including August 8, 2025, to file a supplemental declaration and supporting exhibits.

Dated: August 6, 2025

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s/Erin M. Secord

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