
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

SEGUNDO ELOY GUAMAN GUASCO,

Case No. 1:25-cv-01650-DFB

-against-

BRIAN MCSHANE, in his official capacity
as acting Philadelphia Field Office Director
for U.S. Immigration and Customs Enforcement,
KRISTI NOEM, in her capacity as Secretary for
the United States Department of Homeland Security;
PAMELA BONDI, in her official capacity as the
Attorney General of the United States,

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff SEGUNDO ELOY GUAMAN GUASCO
Requests that the Court:

**PERMIT THE PETITIONER TO AMEND THE PETITION
FOR WRIT OF HABEAS CORPUS ON CONCURRENCE**

In Support of this motion, Paul B. Grotas, Esq submits the following documents:

- A memorandum of law
- Pursuant to Local Rule 15.1 the amended pleading, the original pleading with the new material highlighted, the exhibits included with the original pleading which are identical to the amended pleading