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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Adrian Lizandro Lojano Naula,

Case No. 2:25-cv-16700-ES

-against-

KRISTI NOEM, in her capacity as Secretary  
for the United States Department of Homeland  
Security; CORY CHU, Acting Field Office  
Director of New Jersey, Immigration and Customs  
Enforcement, in his official capacity,  
PAMELA BONDI, in her official capacity as the  
Attorney General of the United States,

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff Adrian Lizandro Lojano Naula  
Requests that the Court:

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

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

- A memorandum of law
- Pursuant to Local Rule 7.1 the amended pleading, the original pleading with the new material underlined, the exhibits included with the original pleading which are identical to the amended pleading