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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Ahmed Sharif Ali,

Petitioner,

Case No. 25-cv-4776

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S.
Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs
Enforcement,

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement, and

Eric Klang, Sheriff of Crow Wing
County.

Respondents.

**MEMORANDUM OF LAW
IN SUPPORT OF EMERGENCY
MOTION FOR ISSUANCE
OF ORDER TO SHOW CAUSE**

Petitioner Ahmed Sharif Ali, (“Mr. Ali”) brought a habeas petition pursuant to 8 U.S.C. § 2241, challenging his ongoing detention, on the basis that Constitutional due process rights and the statute under which he is detained, 8 U.S.C. § 1226, prevent Respondents from detaining him without first providing an individualized bond hearing.

Within three days, unless good cause for a delay is shown, “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.

Petitioner requests that the Court issue an Order to Show Cause directing Respondents to file a return within three days of the Court’s order, showing cause, if any, why a writ of habeas corpus should not be granted, and if necessary to provide Petitioner an opportunity to file a reply within two days of the return.

Date: Dec. 26, 2025

/s/ Kira A. Kelley

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Attorney for Petitioner

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**LR 7.1 WORD COUNT
COMPLIANCE CERTIFICATE**

Todd M. Lyons, Acting Director of
Immigration and Customs
Enforcement,

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement, and

Eric Klang, Sheriff of Crow Wing
County.

Respondents.

I, Kira Kelley, certify that Petitioner's Memorandum of Law in Support of Emergency Motion for Issuance of Order to Show Cause conforms to the requirements of LR 7.1. This reply memorandum was prepared in 14-point font using Google Docs, whose word count function has been applied specifically to count all text aside from the case caption and signature block, and includes headings, footnotes, and quotations. The total count is 178 words.

Date: Dec. 26, 2025

/s/ Kira A. Kelley

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