

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division

_____)
Tedros Mhreteab Teklemariam,)
)
Petitioner.) Civil Action No. 3:26-cv-183-E
)
v.)
)
Warden, Prairieland Detention Center, *et al.*)
)
Respondents.)
)

MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL

Pursuant to L.R. 83.10, Petitioner respectfully submits this Motion for Leave to Proceed Without Local Counsel, and in support thereof states as follows:

1. Pursuant to Local Rule 83.10, “[a]ttorneys desiring to proceed without local counsel must obtain leave from the presiding judge.” The Rule does not state any particular standard for leave to be granted, and therefore it can be presumed that the standard is good cause.
2. Petitioner is a low-income immigrant who has been in ICE detention since May 2025.
3. This case involves immigration litigation, a legal area recognized for containing sensitive and confidential information. Federal courts have consistently acknowledged the necessity of limiting access to such information to protect the privacy and security of the individuals involved. Appointing local counsel would broaden access to this sensitive information, increasing the risk of exposure. Allowing Petitioner’s out-of-district counsel to proceed without local counsel serves the interests of privacy and security by limiting the number

of individuals with access to the Petitioner's sensitive personal information.

4. In the experience of undersigned counsel, who has handled over 100 immigration habeas corpus cases, many such cases resolve without any hearings before a District Judge. Were a hearing necessary, undersigned counsel would seek leave to appear by telephone or Zoom, but is fully prepared and capable of appearing in person for any hearings upon notice from the Court, should the Court require an in-person hearing.

5. The practice of immigration litigation is a highly specialized field with a limited number of practitioners across the country. Restricting Petitioner to local Dallas attorneys could significantly reduce access to competent legal representation. Petitioner's counsel possesses extensive experience, having filed and litigated hundreds of immigration cases over the past fifteen years in over a dozen U.S. District Courts throughout the nation. Furthermore, Petitioner's counsel is an active member of the of the National Immigration Project of the National Lawyers Guild, as well as the American Immigration Lawyers Association (AILA) and three of its committees: the Benefits Litigation Committee, the Federal Court Litigation Committee, and the Federal Court Litigation Online Course Committee, where he has developed curriculum for AILA's Federal Court Litigation course. Given this specialized expertise, requiring local counsel could unjustly hinder Petitioner's access to experienced and qualified representation, thereby affecting the fair administration of justice.

6. Undersigned counsel represents Petitioner on a flat-fee basis. Requiring local counsel would increase the cost of representation to Petitioner.

7. Petitioner's counsel has been granted leave to proceed without local counsel in the following cases in this District: *Yousefinasrabadi v. Villegas*, Civ. No. 1:26-cv-15-H, Dkt. No. 8

(Jan. 21, 2026); *Mustajbasic v. Roark*, Civ. No. 3:25-cv-1936-S, Dkt. No. 9 (Sept. 8, 2025); *Tadele v. Roark*, Civ. No. 3:25-cv-01121-E, Dkt. No. 8 (May 9, 2025).

8. Petitioner's counsel has proactively reached out to the U.S. Attorney's Office, but did not receive a response by close of business.

9. For the foregoing reasons, Petitioner respectfully requests that this Court grant the Motion for Leave to Proceed Without Local Counsel, thereby permitting Petitioner's counsel to continue representing the Petitioner in this matter without the necessity of appointing additional local counsel.

Respectfully submitted this 26th day of January 2026.

/s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg, Esq.
N. D. Tex. Bar no. 77110VA
Counsel for Petitioner
Murray Osorio PLLC
4103 Chain Bridge Road, Suite 300
Fairfax, Virginia 22030
Telephone: 703-352-2399
Facsimile: 703-763-2304
ssandoval@murrayosorio.com

CERTIFICATE OF SERVICE

I certify that I filed this motion and its attachments on the court's CM/ECF electronic filing system, which provides notice to all parties.

January 26, 2026

Respectfully submitted,

/s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg, Esq.
N. D. Tex. Bar no. 77110VA
Counsel for Petitioner
Murray Osorio PLLC
4103 Chain Bridge Road, Suite 300
Fairfax, Virginia 22030
Telephone: 703-352-2399
Facsimile: 703-763-2304
ssandoval@murrayosorio.com

CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs has contacted Counsel for Defendants to get Defendants' position on this motion. Defendants indicated by email that they do not oppose to this motion.

May 8, 2025

Respectfully Submitted,

/s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg, Esq.
N. D. Tex. Bar no. 77110VA
Counsel for Plaintiff
Murray Osorio PLLC
4103 Chain Bridge Road, Suite 300
Fairfax, Virginia 22030
Telephone: 703-352-2399
Facsimile: 703-763-2304
ssandoval@murrayosorio.com

Attorney for Plaintiffs