

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY DIVISION**

KAIRAT KUDUSOV

Petitioner,

v.

PAM BONDI, Attorney General, et al.,

Respondents.

CASE NO. 5:26-cv-00132-HE

Hon. Joe Heaton
U.S. District Judge

MOTION TO WAIVE LOCAL COUNSEL REQUIREMENT

Petitioner, by and through undersigned counsel, respectfully moves the Court for a waiver of the local counsel requirement pursuant to Local Civil Rule 83.3(c), and in support thereof states as follows:

1. Undersigned counsel is duly admitted to practice before this Court but is not a resident of, and does not maintain an office in, the State of Oklahoma. (See Affidavit of Harun Taskin, attached hereto as Exhibit 1)

2. Local Civil Rule 83.3(a) provides that an attorney who is not a resident of, and does not maintain an office in, Oklahoma must associate with local counsel.
3. Relief from this requirement is expressly authorized under Local Civil Rule 83.3(c) upon a showing of special qualifications or other good cause, provided that counsel certifies familiarity with the Court's Local Civil Rules.
4. Good cause exists to grant relief from the local counsel requirement in this case. Undersigned counsel has substantial and specialized experience litigating federal habeas corpus matters arising from immigration detention, particularly cases involving alien detainees challenging statutory detention authority.
5. Specifically, undersigned counsel has represented immigration detainees in federal habeas corpus proceedings in multiple federal judicial districts, including but not limited to the Northern District of Illinois, the Western District of Michigan, the Western District of Texas, the Southern District of Texas, and the Western District of Missouri. These matters have routinely involved challenges to prolonged and mandatory immigration detention under 28 U.S.C. § 2241 and related statutory and constitutional claims.
6. In addition to federal habeas practice, undersigned counsel has extensive experience representing noncitizens in removal proceedings before the United States immigration courts across multiple jurisdictions. This practice includes litigation of detention-related issues that are directly related to, and intertwined with, the habeas claims presented in this action.

7. Requiring the association of local counsel in this matter would impose unnecessary financial burden on Petitioner and would not materially assist the Court, given undersigned counsel's specialized expertise in immigration detention habeas litigation and familiarity with the procedural and substantive issues presented.
8. Undersigned counsel hereby certifies familiarity with the Local Civil Rules of this Court and agrees to comply fully with all applicable rules and procedures.
9. For good cause shown, waiver of the local counsel requirement is appropriate in this case and will not prejudice Respondents or burden the Court.

WHEREFORE, Petitioner respectfully requests that the Court grant this Motion and permit undersigned counsel to appear on behalf of Petitioner without association of local counsel in this action.

Respectfully submitted on January 28, 2026.

/s/ Harun Taskin

Harun Taskin, Esq.
Illinois State Bar # 6342748
Kent Law Partners LLC
1701 E Woodfield Rd. Suite 820
Schaumburg, IL 60173
Phone: 312-724-5555
Fax: 312-724-5555
htaskin@kentlawpartners.com

ATTORNEY FOR PETITIONER