

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAD ALWAWI, 	)	
<i>Petitioner,</i>	)	Case No. 3:26-cv-00375-JRK
	)	JUDGE JAMES R. KNEPP II
v.	)	MAGISTRATE JUDGE JAMES E.
	)	GRIMES JR.
KRISTI NOEM, Secretary	)	
of the U.S. Department of Homeland	)	
Security; ET AL.,	)	EMERGENCY NOTICE REGARDING
	)	DEFENDANTS' INTENT TO MOVE
	)	PETITIONER
<i>Respondents.</i>	)	

INTRODUCTION

COMES NOW, the Petitioner, Jad Alwawi, by and through undersigned counsel and hereby submits this respectfully submits this Emergency Notice Regarding Defendants' Intent to Move the Petitioner to a new facility or possibly deport the Petitioner The Parties are currently waiting on a decision by the Judge on the Magistrate Judge's Rules and Recommendations to release the Petitioner. Petitioner's Counsel has been made aware that Defendants' are intending to relocate the Petitioner as soon as June 1, 2026. This relocation would thwart the pending litigation and is in bad faith by the Defendants.

STATEMENT

Petitioner respectfully moves this Court for a temporary restraining order pending its adjudication of his Petition for Writ of Habeas Corpus and Complaint for Injunctive Relief. Specifically, Petitioner requests the Court to order Respondents-Defendants to cease any ongoing actions and refrain from taking any additional actions toward effectuating Petitioner's removal from the United States, or out of the Court's jurisdiction until the Court has adjudicated his petition and complaint.

CONCLUSION AND RELIEF SOUGHT

For the reasons stated above, the Court should overrule Respondent's objections, adopt the R&R in its entirety, grant the Petition for relief, and enter a temporary restraining order restricting the Defendants from relocating the Petitioner to a new facility, or deport the Petitioner.

Counsel for Petitioner
Dated: June 1, 2026

Respectfully Submitted,

**/s/ Gus Shihab
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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2026, the foregoing *Emergency Notice Regarding Defendants' Intent to Move the Petitioner*. was served on the following through the CM/ECF system:

**KRISTI NOEM, SECRETARY
U.S. DEPARTMENT OF HOMELAND
SECURITY,**

**U.S. DEPARTMENT
OF HOMELAND SECURITY,**

**PAM BONDI, ATTORNEY GENERAL
OF THE UNITED STATES**

**KEVIN RAYCRAFT, DIRECTOR OF
THE FIELD OFFICE OF ICE**

Respectfully Submitted,

**/s/ Gus Shihab
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