

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAHMOUD KHALIL,

Petitioner,

- against -

WILLIAM P. JOYCE, *et al.*,

Respondents.

No. 25 Civ. 1935 (JMF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law in support of the Respondents' motion to dismiss or transfer, and the supporting declaration of Acting Field Office Director William P. Joyce, Respondents, through their attorneys, will move this Court before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, for an order dismissing this case without prejudice for lack of venue/jurisdiction, or alternatively to transfer it.

Dated: New York, New York
March 12, 2025

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division

MATTHEW PODOLSKY
Acting United States Attorney
Southern District of New York
Attorney for the Respondents

By: /s/ Brandon M. Waterman
JEFFREY OESTERICH
BRANDON M. WATERMAN
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2695/2743
jeffrey.oestericher@usdoj.gov
brandon.waterman@usdoj.gov