

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

YARA CHEHAB,
As Next Friend of Rasha Alawieh

Petitioner,

v.

KRISTI NOEM, ET AL.,

Respondent.

Case No. 1:25-cv-10614 (LTS)

**NOTICE OF APPARENT VIOLATION OF COURT ORDER & EMERGENCY
REQUEST FOR JUDICIAL ACTION**

Petitioner files this NOTICE to inform the Court of Respondents' apparent violation of the Court's ORDER, dated 7:18 pm, March 14, 2025 (Docket No. 4), restraining Respondents from causing petitioner Rasha Alawieh to be moved outside the District of Massachusetts without providing the Court 48 hours' advance notice of the move and the reason therefore. As the attached declaration of Arnold & Porter attorney Clare Saunders (Exhibit A) makes clear, Respondents had actual notice of this Court's jurisdiction and imminent order, had actual notice of this Court's order and willfully disobeyed this Court's order.

Petitioner is currently detained at the Charles de Gaulle Airport in Paris, France and is scheduled to board a flight from Paris to Lebanon at approximately 4:00 AM EST tomorrow, March 16, 2025.

Petitioner intends imminently to file a motion to return petitioner to the District of Massachusetts. Petitioner respectfully requests an order requiring petitioner's immediate return to the District of Massachusetts and an **emergency hearing as soon as practicable**.

Dated: March 15, 2025

Respectfully submitted,

/s/ John A. Freedman
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Attorney for Petitioner Yara Chehab

CERTIFICATE REGARDING LOCAL RULE 7.1

I, John A. Freedman, hereby certify that no attorneys for Defendants have entered an appearance in this matter. I was therefore unable to meet and confer pursuant to Local Rule 7.1.

/s/ John A. Freedman

John A. Freedman

CERTIFICATE OF SERVICE

I, John A. Freedman, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on March 15, 2025.

/s/ John A. Freedman

John A. Freedman