

No.

In The
Supreme Court of the United States

FIEZEL MOHAMAD

Petitioner,

v.

WILLIAM BARR, ATTORNEY GENERAL
OF THE UNITED STATES

Respondent.

On Petition for a Writ of Certiorari
To the United States Court of Appeals
For the Eleventh Circuit

**EMERGENCY MOTION FOR STAY OF REMOVAL
JUSTICE CLARENCE THOMAS**

Respectfully submitted,
David Stoller, Esquire
4445 S. Conway Rd.
Orlando, Florida 32812
(407) 999-0088
Florida Bar No. 92797

Attorney for Petitioner

EMERGENCY MOTION FOR STAY OF REMOVAL

Petitioner, Fiezel Mohamad, hereby files this emergency motion for stay of removal before Justice Clarence Thomas, Justice for the Eleventh Circuit Court of Appeals.

In support thereof, Petitioner states as follows :

That a Petition for Review is pending before the Eleventh Circuit Court of Appeals *sub nom.* Fiezel Mohamad v. William Barr, Attorney General of the United States, Case No. 19-13971 (11th Cir.) ;

That on or about February 21, 2020, the undersigned received word that Petitioner's removal from the United States was imminent;

That on or about February 24, 2020, the undersigned filed an Emergency Motion for Stay of Removal before the Eleventh Circuit Court of Appeals. The relief requested therein was a Stay of Removal pending adjudication of the Petition for Review;

That on or about February 24, 2020, Respondent filed a response in opposition to that request;

That on or about February 24, 2020, a panel of the Eleventh Circuit Court of Appeals granted a 48 hour Stay of Removal pending consideration of the Emergency Motion for Stay of Removal requested;

That on or about February 26, 2020, the same panel of the Eleventh Circuit Court of Appeals denied Petitioner's Emergency Motion for Stay of Removal;

That on or about March 6, 2020, the undersigned again received word that Petitioner's removal was imminent;

That on or about March 8, 2020, the undersigned filed a Petition for Writ of Certiori before this Court with an accompanying Appendix. The Petition seeks review of the Eleventh Circuit's denial of Petitioner's Emergency

That as of the filing of this request, the undersigned cannot find Petitioner in the Online Detainee Locator system. Upon knowledge and belief, the undersigned submits that Petitioner has been removed from an immigration detention center and that he is being transported for removal from the United States. The undersigned has been informed that Petitioner's removal is scheduled for today, March 9, 2020.

That a copy of the orders from the Eleventh Circuit Court of Appeals are included herein (Appendix 1, Appendix 2);

That a copy of Petitioner's Emergency Motion for Stay of Removal is included herein (Appendix 3).

That a copy of Respondent's response in opposition to Petitioner's Emergency Motion for Stay of Removal is included herein (Appendix 4).

That the undersigned begs the Court's indulgence for the brevity of this request. The undersigned was informed of the imminence of Petitioner's removal during the afternoon of March 6, 2020 and has worked as quickly as possible to present this matter before the Court.

CONCLUSION

In light of the imminent removal and deportation of Petitioner from the United States, he respectfully requests consideration of the instant Emergency Motion for Stay of Removal.

Respectfully submitted,
David Stoller, Esquire
Law Offices of David Stoller, PA
4445 s. Conway Rd.
Orlando, Florida 32812
(407) 999-0088

Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Emergency Motion for Stay of Removal has been sent on March 9, 2020 to the following :

Joseph O'Connell
Office of Immigration Litigation
PO Box 878, Ben Franklin Station
Washington, DC 20044