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THE STATE OF NEW HAMPSHIRE

SUPREME COURT

In Case No. 2025-0421, Farres Alkhayer v. City of Nashua & a., the court on April 22, 2026, issued the following order:

No objection having been received, the plaintiff's motion for leave to supplement and replace his brief is granted.

The court has reviewed the written arguments and the record submitted on appeal, and has determined to resolve the case by way of this order. See Sup. Ct. R. 20(3). The plaintiff, Farres Alkhayer, appeals the order of the Circuit Court (Major, J.) dismissing his petition for a writ of replevin. See RSA ch. 536-A (2021). We construe the plaintiff's brief to argue that: (1) it was a violation of his right to due process under the federal and State constitutions for defendant City of Nashua (city) to tow his vehicle without providing him with a pre-deprivation hearing; (2) the city was required in the replevin action to prove that the plaintiff violated parking regulations resulting in unpaid tickets and subjecting his vehicle to being towed; and (3) the city's post-deprivation process was insufficient.

A city ordinance provides that a vehicle will be towed if the owner has incurred more than a threshold amount in non-moving fines. Nashua, N.H., Rev. Ordinances ch. 320, art. XV, § 320-89. In this case, the trial court found that, at the time the plaintiff's vehicle was towed, the plaintiff "had amassed well over $200 in unpaid parking tickets," which was more than the threshold amount. The court found that the plaintiff failed to pay the fines he owed and "failed to take advantage of the timely post-towing appeal process that was available to him." Applying our recent decision in Appeal of Doe, the trial court ruled that, under these facts and circumstances, the plaintiff was not entitled to a pre-deprivation hearing before the city towed his vehicle. See Appeal of Doe (Bd. of Med.), 177 N.H. 274, 280-81 (2025), 2025 N.H. 13, ¶¶13-15 (setting forth standard to determine whether due process requires a pre-deprivation hearing).

As the appealing party, the plaintiff has the burden of demonstrating reversible error. Gallo v. Traina, 166 N.H. 737, 740 (2014). Based upon our review of the trial court's well-reasoned order, the plaintiff's challenges to it, the

relevant law, and the record submitted on appeal, we conclude that the plaintiff has not demonstrated reversible error. See id.

Affirmed.

MacDonald, C.J., and Donovan, Countway, Gould, and Will, JJ., concurred.

Timothy A. Gudas,
Clerk

Distribution:
9th N.H. Circuit Court - Nashua District Division, 459-2025-CV-00114
Honorable Jason R.L. Major
Honorable Ellen V. Christo
Farres Alkhayer
Brian J.S. Cullen, Esq.
Francis C. Fredericks, Supreme Court
Sherri L. Miscio, Supreme Court
File

THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
NH CIRCUIT COURT

9th Circuit - District Division - Nashua
30 Spring Street, Suite 101
Nashua NH 03060

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
https://www.courts.nh.gov

Case Name: **Farres Alkhayer v. City of Nashua; Nashua Police Department; D&R Towing**
Case Number: **459-2025-CV-00114**

FINAL ORDER

A Final Hearing was held in this replevin action on May 23, 2025. Plaintiff appeared pro se. Defendant appeared with counsel. This case revolves around the Defendant City of Nashua's towing and impoundment of the plaintiff's BMW automobile both for being unregistered and parked on a public way, and for Plaintiff's failure to pay or appeal a number of parking tickets that exceeded $200 in fines.

The Defendant appeared with a Nashua Parking Enforcement Officer and Nashua Police Officer, whose testimony was taken via offers of proof made by Defendant's counsel. Plaintiff was afforded an opportunity to cross-examine both witnesses. Defendant also provided a parking enforcement summary showing the unpaid tickets at issue. The evidence adduced at the hearing demonstrated that, at the time the BMW was towed, Plaintiff had amassed well over $200 in unpaid parking tickets. The vehicle was also parked unregistered and illegally parked on a public way. The testimony was that Plaintiff's vehicle was towed for violation of the following city ordinances:

Nashua City Ordinance § 320-89, which provides:

> Between April 1 and October 31, any time an owner of a vehicle has unpaid non-moving fines totaling $200 or more, the owner will be subject to an additional $50 fine and all towing fees incurred. The owner's vehicle will be towed and will not be released until the total fine and all towing fees are paid in full.

Nashua City Ordinance $320.77, which provides:

> No unregistered vehicle shall be parked on any public street or in any City-owned public parking lot or garage. The last owner of record, according to the State of New Hampshire registration records, of any vehicle violating this section shall be fined at least $50, and shall be responsible for the cost of towing.

The parking tickets each provided a means of appeal, which is spelled out on the envelope they are left in when placed on a ticketed individual's vehicle. The appeal process allows up to 7 days for the recipient of the ticket to either pay the fine or object in writing. The parking tickets issued against Plaintiff span a period from December 2, 2024, through March 20, 2025. The BMW was towed on April 7, 2025. Plaintiff did not pay or timely contest the tickets under the City's appeal process, nor did he seek a hearing pursuant to RSA 262:33.

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Plaintiff testified that he was unaware of all but two of the tickets at issue. He claimed he received no notice of any tickets except the two issued on December 2, 2024 (which he apparently did not appeal or pay). The Parking Enforcement Officer testified it was his department's standard protocol to place tickets (which are placed in a reasonably sturdy, bright yellow envelope) securely under the driver's side windshield wiper of a ticketed vehicle. Plaintiff theorized that 5 of the 7 tickets at issue could have blown away or that they might have been stolen. The Court cannot credit this assertion. Had Plaintiff claimed he was not properly noticed as to one ticket for some unknown act of god reason, the Court might credit his testimony. It is a bridge too far to believe that 5 tickets went missing for unknown reasons. Plaintiff did not dispute that the BMW was unregistered and on a public way at the time it was towed. Rather, he claimed it was unfair to have the vehicle towed when it was just a car length away from his private driveway.

Plaintiff further takes the position that it was a violation of his due process rights for the Defendant to tow his vehicle without providing him with pre-deprivation due process which, in his view, would require Defendant to seek a writ of replevin in this Court before it could tow his vehicle. The Court concludes, not for the first time in this case, that this argument is without merit.

> The fundamental requisite of due process is the right to be heard at a meaningful time and in a meaningful manner. No rigid taxonomy exists for evaluating the adequacy of state procedures in a given case; rather 'due process is flexible and calls for such procedural protections as the particular *situation* demands.' The United States Supreme Court has *recognized* "on many occasions, that where a State must act quickly, or where it would be impractical to provide predeprivation due process, postdeprivation process satisfies the requirement of the Due Process Clause. In matters of public health and safety, the Supreme Court has long recognized that the government must act quickly. Quick action may turn out to be wrongful action, but due process requires only a postdeprivation opportunity to establish the error."
>
> Accordingly, to determine both whether a pre-deprivation hearing is required and what process is due, [the Court must] balance three factors: (1) the private interest that is affected; (2) the risk of erroneous deprivation of that interest through the procedure used and the probable value of any additional or substitute procedural safeguards; and (3) the government's interest, including the fiscal and administrative burdens resulting from additional procedural requirements. "Whether the deprivation was, in fact, justified is not an element of the procedural due process inquiry."

Appeal of Doe, 2025 N.H. 13, 15 (March 18, 2025) (internal citations and quotations omitted). Under Plaintiff's theory, a local government enforcement of its ordinances, to include removal of unsafe vehicles from its roadways, would be hobbled if it were required to utilize a months-long process of obtaining a writ of replevin before it could do so. Such an unreasonable result is plainly not intended by the Due Process Clause as interpreted by either the New Hampshire Supreme Court or the U.S. Supreme Court. See Id. Plaintiff was provided with multiple, rapidly available post-deprivation due process opportunities, to either dispute the traffic tickets and/or the towing of his vehicle. He chose to avail himself of none of them, instead choosing the much slower replevin process instead.

It is well-settled, as evidenced from long-standing case law around the country, that pre-deprivation due process is not required for a municipality to seize and impound an automobile in the service of enforcing its motor vehicle ordinances. See, e.g., Soffer v. City of Costa Mesa, 798 F.2d 361 (9th Cir. 1986) (upholding Federal District Court ruling that pre-deprivation due process was not required for the impoundment of a vehicle); Cokinos v. District of Columbia, 728 F.2d 502 (D.C. Cir. 1983); Sutton v. City of Milwaukee, 672 F.2d 644 (7th Cir. 1982).

Plaintiff cites to Fuentes v. Chevin, 407 U.S. 67 (1972) to support his argument that pre-deprivation process is required in this case. His argument stretches the ruling in Fuentes too far. The same argument was discussed and held to be without merit over thirty years ago in the 7th Circuit Court of Appeals' decision in Sutton:

> The appellees rely heavily on the statement in Fuentes v. Shevin, 407 U.S. 67, 90, 92 S.Ct. 1983, 1999, 32 L.Ed.2d 556 (1972), that the situations in which property may be seized without advance notice and an opportunity to be heard "must truly be unusual." But Fuentes involved summary repossession by installment creditors rather than the enforcement of parking regulations, and we think the Supreme Court would be surprised to find that by using the quoted language it had outlawed the towing of illegally parked cars except in emergency situations. A subsequent Supreme Court decision, Calero-Toledo v. Pearson Yacht Leasing Co., 416 U.S. 663, 679-80, 94 S.Ct. 2080, 2089-90, 40 L.Ed.2d 452 (1974), held that it was constitutional to seize, without prior notice or opportunity to be heard, a boat that was suspected of carrying contraband. The Court distinguished Fuentes on two grounds: the seizure was initiated by the public authorities to serve important regulatory interests, and advance warning would have enabled removal of the property from the reach of the authorities. Both of these factors are present in this case as well.

See also Miranda v. City of Cornelius, 459 F.3d 858 (2005) (distinguishing impoundment of vehicle on public street and in a private drive, with the former being consistent with police community caretaking functions); Gilles v. Wineteer, 2019 WL 6037422 at 7 (S.D. California); Goichman v. Rheuban Motors, Inc., 682 F.2d 1320, 1323-24 (recognizing "the government's interest in efficient and inexpensive towage of illegally parked automobiles"); Stypmann v. City and Cty of San Francisco, 557 F.2d 1338, 1343 ("The public interest in removing vehicles from streets and highways in the circumstances specified in the traffic code is also substantial....")

Simply put, Plaintiff's continued insistence on a right to a pre-deprivation hearing for the towing of his unregistered and oft-ticketed vehicle relies on a clear misstatement of the law that is rapidly trending toward frivolity. Defendant has met its burden of demonstrating that it was justified in towing and impounding Plaintiff's vehicle. Plaintiff has failed to prove that he has a superior possessory right to the vehicle under the circumstances of the case. He failed to pay the fines that were owed. He failed to take advantage of the timely post-towing process that was available to him. His remedy is to pay the amounts owed to the City of Nashua. His replevin action is hereby DISMISSED.

SO ORDERED.

May 23, 2025
Date

Judge Jason R.L. Major

Clerk's Notice
Document sent to parties
on 06/05/2025

Any motion for reconsideration must be filed within 10 days of the date of this notice. Any appeal to Supreme Court must be filed within 30 days of the date of this notice.

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THE STATE OF NEW HAMPSHIRE

SUPREME COURT

In Case No. 2025-0421, Farres Alkhayer v. City of Nashua & a., the court on May 26, 2026, issued the following order:

Supreme Court Rule 22(2) provides that a party filing a motion for rehearing or reconsideration shall state with particularity the points of law or fact that the party claims the court has overlooked or misapprehended.

We have reviewed the claims made in the motion for reconsideration and conclude that no points of law or fact were overlooked or misapprehended in our decision. Accordingly, upon reconsideration, we affirm our April 22, 2026 decision and deny the relief requested in the motion.

Relief requested in motion for reconsideration denied.

MacDonald, C.J., and Donovan, Countway, Gould, and Will, JJ., concurred.

Timothy A. Gudas,
Clerk

Distribution:
9th N.H. Circuit Court - Nashua District Division, 459-2025-CV-00114
Honorable Jason R.L. Major
Farres Alkhayer
Brian J.S. Cullen, Esq.
Sherri L. Miscio, Supreme Court
File

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File Date: 6/10/2025 1:2
9th Circuit - District Division - Na
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STATE OF NEW HAMPSHIRE
NASHUA DISTRICT COURT
HILLSBOROUGH COUNTY

Farres Alkhayer v. City of Nashua; Nashua Police Department; D&R Towing

Case Number: 459-2025-CV-00114

MOTION TO RECONSIDER

NOW COMES, FARRES ALKHAYER, and respectfully moves this Honorable Court to reconsider its Final Order issued on May 23, 2025, dismissing the Petitioner's Emergency Petition for Writ of Replevin. This motion is based upon clear error of law and fact, and the manifest injustice that will result from the enforcement of the Court's current Order.

ARGUMENT I
THE TRIAL COURT'S FAILING TO REQUIRE PROOF OF A WARNING STICKER, URGENT NEED TO TOW, AND ACTUAL ORDINANCE VIOLATION IS REVERSIBLE ERROR:

A. Due Process and Mathews v. Eldridge Demand Factual Findings Before Seizure:
The Fifth Amendment — and New Hampshire law — require that any forcible deprivation of property *must* be supported by sufficient factual findings. Mathews v. Eldridge, 424 U.S. 319, 333 (1976), sets the framework: before seizing a car, the City must weigh "the private interest," "the risk of erroneous deprivation," and "the government interest." Without evidence that the vehicle posed an immediate danger or violated a parking regulation at that very moment without the owner standing next to it, there was no basis for an exigent-circumstances exception. See Calero-Toledo v. Pearson Yacht Leasing Co., 416 U.S. 663, 679 (1974) (post-seizure process insufficient where government offered no proof of emergency).

B. Neither The Police Officer Nor the Parking Authority Supervisor Identified Any Urgency:
At the replevin hearing, Plaintiff called both Officer Smith — who effectuated the tow — and the Parking Authority supervisor. Crucially, neither witness testified that:

- The vehicle blocked traffic, endangered public safety, or interfered with police operations; nor

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9th Circuit - District Division - Nashua

• Any Nashua ordinance authorized an immediate tow absent such exigent circumstances.

This complete absence of proof contravenes Mathews's requirement of "specific findings." The Supreme Court has consistently held that while pre-deprivation hearings are generally required before an individual can be deprived of a significant property interest, exceptions exist for "extraordinary situations where some valid governmental interest is at stake that justifies postponing the hearing until after the event." Boddie v. Connecticut, 401 U.S. 371, 379 (1971) and "within the limits of practicability". Defendants failed to prove there were any "extraordinary situations".

C. The City Failed to Prove Any Actual Parking or Registration Violation:

Due process also demands that the City establish a valid predicate violation. Here, the defense adduced zero evidence that, when tickets were issued, the vehicle was obstructing a fire lane, or otherwise contravening Nashua's parking regulations. In its Order, the trial court neglected this failure of proof entirely. Yet civil-forfeiture and replevin decisions routinely hold such seizures wrongful absent proof of an underlying violation.

To allow a government entity to seize property based on alleged violations without proving the existence of those violations would be a profound miscarriage of justice and a clear violation of due process. It would effectively shift the burden to the property owner to disprove violations that the government itself cannot substantiate. This is contrary to established legal principles that require the party asserting a claim to prove its elements. The Circuit Court's decision, by failing to demand proof of the underlying violations, essentially condoned a deprivation of property based on unsubstantiated claims.

This omission is particularly egregious given Appellant's consistent dispute of the tickets and his claim of insufficient notice. Without proof that the vehicle was indeed in violation when the tickets were issued, the Court's decision to uphold the towing based on accumulated fines is an error of law and fact. This failure to consider the validity of the underlying violations directly impacts the lawfulness of the seizure and necessitates reconsideration.

D. New Hampshire Statutes Reinforce the Need for Proof of Valid Tow:

RSA 262:40-a requires conspicuous notice in parking facilities that "illegally parked vehicles are subject to towing at the owner's expense." RSA 262:35-a permits only post-impoundment review of "towing and storage charges," not validation of the

initial tow. Without proof of both proper notice and a valid violation, the City lacked statutory authority to remove Plaintiff's car.

E. Persuasive Jurisprudence Demands Reversal

First-Circuit precedent similarly holds that seizures must be narrowly tailored and supported by actual evidence of urgency. United States v. James Daniel Good Real Property, 510 U.S. 43, 56–57 (1993). And in civil asset forfeiture, courts require the government to prove a "substantial connection" between the property and the offense. United States v. Funds in the Amount of $239,400, 795 F.3d 639, 648–49 (7th Cir. 2015). Here, the City offered nothing — no testimony, documents, or a single photograph — to meet its burden.

For all these reasons, the trial court erred in dismissing the replevin petition without requiring the City to produce evidence of (1) an exigent need to tow, and (2) an actual ordinance violation. Plaintiff respectfully requests that this Court reverse and remand for further proceedings in which the City must shoulder its burden of proof before permanently depriving Plaintiff of his car.

ARGUMENT II

A. The Court's Factual Finding Regarding Notice of Parking Violations is a reversible error:

The Court erred in its factual finding regarding the Petitioner's awareness of the parking tickets, dismissing his testimony as a "bridge too far" without fully appreciating the inherent flaws in the Respondent's notification method. Due process requires that a party be given adequate notice and an opportunity to be heard. While the Respondent testified to a "standard protocol" of placing tickets under the driver's side windshield wiper, this method is demonstrably unreliable. It is extremely simple that environmental factors such as wind, rain, or even snow can easily dislodge or obscure such notices. Furthermore, the possibility of theft or malicious removal by third parties cannot be summarily dismissed, especially given the public nature of the parking location.

Petitioner's testimony that he was unaware of five out of seven tickets is entirely plausible given the precarious placement of the notices. *The burden should not be on the Petitioner to prove the non-receipt of a notice that was delivered via an insecure and easily compromised method.*

The Court's reliance on the Respondent's "standard protocol" as conclusive proof of notice effectively shifts the burden from the entity responsible for providing notice

to the individual who claims non-receipt. This is contrary to the spirit of due process, which demands that notice be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." Mullane, 339 U.S. at 314. A bright yellow envelope, however sturdy, placed precariously on a windshield in a public area, does not meet this standard when weighed against the significant deprivation that can result from a failure to receive such notice.

More importantly, the Court failed to address Petitioner's specific claim that his vehicle did not display a state of New Hampshire notice sticker, which is a prerequisite for lawful removal under state proper procedure (when a vehicle is abandoned on a private property for example). The towing itself is unlawful, regardless of the parking violations which neither the City of Nashua, nor the Nashua Police Department proved to the court. The absence of a finding on this specific factual assertion constitutes a material omission that warrants reconsideration, as it could fundamentally alter the legality of the Respondent's actions.

B. The Court's application Due Process Principles Erred in Distinguishing Fuentes v. Shevin and is reversible error:

The Court's distinction of Fuentes v. Shevin, 407 U.S. 67 (1972), and its application of due process principles to the instant case, represents a clear error of law. The Court failed to grasp the broader constitutional principle articulated therein: that, absent extraordinary circumstances, an individual cannot be deprived of a significant property interest without a prior hearing. The Supreme Court in Fuentes stated:

"For more than a century, the central meaning of procedural due process has been clear: Parties whose rights are to be affected are entitled to be heard; and in order that they may enjoy that right, they must first be notified."
The Court's attempt to narrowly confine Fuentes to its specific factual context ignores the fundamental constitutional protection it sought to establish. A motor vehicle, even if subject to parking fines, undeniably constitutes a "significant property interest" for all individuals, often essential for employment, childcare, and daily necessities. The deprivation of such property, even temporarily, imposes a substantial burden on the owner.

The Court cited Calero-Toledo v. Pearson Yacht Leasing Co., 416 U.S. 663 (1974), to support the notion that pre-deprivation notice is not required when seizures are initiated by public authorities for important regulatory interests and advance warning would enable removal of property. However, the facts of the instant case are not aligned with Calero-Toledo and are distinguishable from it. In Calero-Toledo, the seizure involved a yacht suspected of carrying contraband, where immediate action was necessary to prevent the removal of evidence or the continuation of illegal activity. Here, the Petitioner's vehicle was allegedly in violation of parking ordinances, not actively engaged in criminal enterprise that necessitated immediate, unannounced seizure. The Petitioner's offer to immediately move his vehicle to his private driveway, a mere three feet away, directly refutes the argument that advance warning would have enabled removal of the property from the reach of authorities in a manner that would frustrate legitimate enforcement. This critical fact, which the Court acknowledged but seemingly disregarded in its due process analysis, demonstrates that a less intrusive alternative was readily available and would not have undermined the City's regulatory interests.

The Court's reliance on cases such as Soffer v. City of Costa Mesa, Cokinos v. District of Columbia, and Sutton v. City of Milwaukee is also misplaced. While these cases generally uphold municipal impoundment without pre-deprivation hearings, they involve circumstances where the vehicle posed an immediate hazard, was abandoned, or where the owner was absent and could not be readily contacted. In the present case, the Petitioner was present, identified himself as the owner, and offered an immediate, practical solution that would have addressed the alleged violations without the need for towing. The Court's blanket application of these precedents without a nuanced consideration of the specific facts of this case constitutes an error of law, and is too obvious of an error that may be a result of a strong bias towards official authorities making the court's June 5th decision seems almost conspiratorial.

The Court's application of the Mathews v. Eldridge balancing test, while ostensibly correct in its framework, was flawed in its execution. Mathews v. Eldridge, 424 U.S. 319 (1976), requires consideration of three factors: (1) the private interest affected; (2) the risk of erroneous deprivation and the probable value of additional safeguards; and (3) the government's interest. The Court significantly underestimated the private interest at stake (loss of property and essential transportation) and the risk of erroneous deprivation, particularly given the disputed notice of tickets and the City's refusal of a simple alternative. The value of an additional safeguard, such as a brief hearing or even simply allowing the owner

to move the vehicle, would have been substantial in preventing an erroneous and burdensome deprivation. The government's interest in efficient enforcement, while legitimate, does not automatically override an individual's fundamental due process rights, especially when less restrictive means are available to achieve the same regulatory goal.

C. The Court's Failure to Adequately Consider the Unreasonableness of the Towing and Available Alternatives is reversible error:

The Court's decision failed to adequately consider the unreasonableness of the Respondent's actions given the Petitioner's immediate offer to move his vehicle. Petitioner's offer to move the vehicle a mere three feet to his private driveway would have instantly remedied the situation. This was a readily available, practical, and non-intrusive alternative to towing that would not only have served the City's interest in regulating public roadways without imposing a significant burden on the Petitioner, but is also a remedy the City allows other people to use each and every day. The refusal of this offer suggests an arbitrary and punitive application of the ordinance rather than a necessary enforcement measure. Furthermore, the Court did not fully address the implications of the Petitioner's claim regarding the absence of a state of New Hampshire notice sticker on the vehicle. The Respondent's failure to ensure its display rendered the towing unlawful ab initio. The Court's omission of a finding on this point leaves a critical legal question unanswered and undermines the validity of its conclusion that the towing was justified.

The purpose of municipal ordinances related to parking is to ensure public safety, order, and the efficient use of public resources. When a less restrictive means, such as allowing the owner to immediately move the vehicle, can achieve these objectives, the more drastic measure of towing becomes unreasonable and often unconstitutional. The Court's failure to critically evaluate the necessity of the towing in light of the Petitioner's offer represents a significant oversight.

D. The Court's Overemphasizing Post-Deprivation Remedies While Disregarding Barriers to Access is reversible error:

The Court's emphasis on the availability of post-deprivation remedies, such as appealing tickets or seeking a hearing under RSA 262:33, effectively ignored the significant barriers to accessing these remedies, particularly the imposition of an excessive bond. Petitioner explicitly stated that he was unable to retrieve his vehicle because he lacked the funds to pay the bond.

The requirement of an excessive bond, especially when an individual has been deprived of their property through what they contend is an unlawful seizure, can render post-deprivation remedies illusory. As stated in Joannin v. Ogilvie, 52 N.W. 217 (1892), compelling payment of such bonds can constitute economic duress, forcing a litigant to incur substantial burdens merely to preserve a basic property right. The Eighth Amendment to the United States Constitution prohibits excessive bail and fines. While the bond in a replevin action is not criminal bail, the principle against excessive financial burdens that effectively deny access to justice is relevant. The Court's failure to address the constitutionality or practical impact of the bond requirement on Petitioner's ability to access the very remedies it cited as sufficient due process is a critical error.

When the cost of accessing a post-deprivation remedy is prohibitive, the remedy itself ceases to be a meaningful opportunity to be heard. The Court's decision, by overlooking this practical barrier, effectively condones a system where individuals with limited financial means are disproportionately impacted and denied effective access to justice, even when their property has been seized under potentially questionable circumstances.

WHEREFORE, Petitioner respectfully moves this Honorable Court to:

A. Grant this Motion to Reconsider;
B. Vacate its Final Order of May 23, 2025;
C. Grant Petitioner's Emergency Petition for a Writ of Replevin;
D. Order the immediate release and return of the subject vehicle to Petitioner's possession;
E. Order Defendants to pay Plaintiff money damages for at least the amount equal to the cost of renting a similar car for the entire period;
F. Grant any further relief that the Court may deem just and proper.

Respectfully submitted,
Farres Alkhayer
06/16/2025

Certificate of Service

I, Farres Alkhayer, certify that on 06/18/2025 a copy of the forgoing was sent to defendants or their attorney via email or mail.

Farres Alkhayer
06/16/2025

Motion Denied.

Jason RL Major

Hon. Jason RL Maior - 06/30/2025