

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
SOUTHERN DIVISION

AHMAD HASSANI
Petitioner,

v.

KRISTI L. NOEM, ET. AL.
Respondents

)
) Case No. 4:25-cv-0970
)
)

)
) HABEAS COMPLAINT
)

PLAINTIFF'S NOTICE OF DISMISSAL WITHOUT PREJUDICE

Petitioner files this notice of dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(i).

1. Petitioner is AHMAD HASSANI; Respondents are the Honorable Kristi Lynn Arnold Noem, Secretary of Homeland Security, the Honorable Pamela Bondi, U.S. Attorney General, Caleb Vitello, United States Immigration and Custom Enforcement Detention and Removal, Todd Lyons, United States Immigration and Custom Enforcement Detention and Removal, United States Immigration and Custom Enforcement Detention and Removal, United States Immigration and Custom Enforcement, Joe M. Smith, Warden, Joe Corley Processing Center.
2. On 03-01-2025, The petitioner through counsel sued Respondents for a Petition for a Writ of Habeas Corpus relief.
3. Petitioner voluntarily moves to dismiss the suit without prejudice, now that the United States Immigration and Customs Enforcement ("ICE") and has released the Petitioner on the evening of 03/19/2025 into the custody of his Legal Permanent Resident brother, see attached **Exhibit "A"** incorporated by reference herein.
4. Defendants have been served through their counsel the United States Attorney for the Southern District of Texas on March 06, 2025, and their initial answer would have been due (60) days later on or about May 6, 2025.
5. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2
6. A receiver has not been appointed in this case.
7. This case is not governed by any federal statute that requires a court order for dismissal of the case.
8. The petitioner has not previously dismissed any federal-or state-court suit based on or including the same claims as those presented in this case.
9. This dismissal is without prejudice.

Respectfully submitted,

THE CALEHR LAW FIRM

/s/: Haroen Calehr

Haroen Calehr

Texas Bar No. 24031787

S.D. Tex. Fed. Admission # 2999

10301 Northwest Freeway, Suite
311

Houston, Texas 77092

Tel. (713) 266-9299

Fax. (713) 680-9532

E-Mail: calehrlaw@yahoo.com

Attorney for Plaintiff:

CERTIFICATE OF SERVICE

United States Attorney
Southern District of Texas
Nicholas J. Ganjei
Daniel Hu, Esq.
Chief of the Civil Division
Cherly Carey, Esq.
1000 Louisiana, Suite 2300
Houston, Texas 77002
Telephone: (713) 567-9354
Fax: (713) 718-3303
Email: DHu@usa.doj.gov
Attorney for the Respondents

By: /S/ Haroen Calehr
Haroen Calehr