### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

§

§

§

 $\omega$   $\omega$   $\omega$   $\omega$   $\omega$   $\omega$   $\omega$   $\omega$ 

JANFRANK BERRIOS LAGUNA,

v.

Petitioner,

·

TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement, in his official capacity; PAMELA BONDI, United States Attorney General, in her official capacity; KRISTI NOEM, Secretary of Homeland Security, in her official capacity; MIGUEL VERGARA, Field Office Director, San Antonio Field Office, in his official capacity; CHARLOTTE COLLINS, Warden at the T. Don Hutto Residential Center, in her official capacity.

Respondents.

Case No. 1:25-cv-00558-RP-SH

## PETITIONER'S NOTICE OF RULE 41(a)(1)(A)(i) VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Petitioner Janfrank Berrios Laguna respectfully submits this Notice of Voluntary Dismissal Without Prejudice. Respondents have not served an answer or motion for summary judgment.

Dated: May 1, 2025 Respectfully submitted,

<u>/s/ Kristy Blumeyer-Martinez</u>

Kristy Blumeyer-Martinez
State Bar of Texas No. 24087177
kristy.blumeyermartinez@raicestexas.org

## Javier Hidalgo

State Bar of Texas No. 24111033 javier.hidalgo@raicestexas.org

## THE REFUGEE AND IMMIGRANT CENTER FOR EDUCATION AND LEGAL SERVICES (RAICES)

P.O. Box 786100

San Antonio, TX 78278

Telephone: (210) 469-4218

Telephone: (210) 469-4042

Facsimile: (210) 910-6588

### Kassandra Gonzalez

Texas Bar No. 24116439

### TEXAS CIVIL RIGHTS PROJECT

P. O. Box 17757

Austin, Texas 78760

(512) 474-5073 ext. 182

(512) 474-0726 (fax)

kassandra@texascivilrightsproject.org

### Erin D. Thorn

Texas Bar No. 24093261

### TEXAS CIVIL RIGHTS PROJECT

1017 W. Hackberry Ave.

Alamo, Texas 78516

(956)-787-8171 ext. 127

(512) 474-0726 (fax)

erin@texascivilrightsproject.org

### Jonathan Levy

Texas Bar No. 24087921

### AMERICAN GATEWAYS

314 E. Highland Blvd.

Austin, Texas 78752

(737) 356-3399

(512) 387-2650 (fax)

jonathanl@americangateways.org

Attorneys for Petitioner

### CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May 2025, I filed this document through the Court's CM/ECF filing system. In addition, a courtesy copy was e-mailed to Respondents' counsel at the address below:

Lacy L. McAndrew Assistant U.S. Attorney U.S. Attorney's Office 601 N.W. Loop 410, Suite 600 San Antonio, TX 78216-5597 lacy.mcandrew@usdoj.gov

Mary F. Kruger Civil Chief U.S. Attorney's Office 601 N.W. Loop 410, Suite 600 San Antonio, TX 78216-5597 mary.kruger@usdoj.gov

> /s/ Kristy Blumeyer-Martinez Kristy Blumeyer-Martinez Attorney for Petitioner

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

\$\text{co} \text{co} \text

JANFRANK BERRIOS LAGUNA,

٧.

Petitioner,

1 61111071

TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement, in his official capacity; PAMELA BONDI, United States Attorney General, in her official capacity; KRISTI NOEM, Secretary of Homeland Security, in her official capacity; MIGUEL VERGARA, Field Office Director, San Antonio Field Office, in his official capacity; CHARLOTTE COLLINS, Warden at the T. Don Hutto Residential Center, in her official capacity.

Respondents.

Case No. 1:25-cv-00558-RP-SH

# PETITIONER'S NOTICE OF RULE 41(a)(1)(A)(i) VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Petitioner Janfrank Berrios Laguna respectfully submits this Notice of Voluntary Dismissal Without Prejudice. Respondents have not served an answer or motion for summary judgment.

Dated: May 1, 2025 Respectfully submitted,

<u>/s/ Kristy Blumeyer-Martinez</u>

Kristy Blumeyer-Martinez
State Bar of Texas No. 24087177
kristy.blumeyermartinez@raicestexas.org

### Javier Hidalgo

State Bar of Texas No. 24111033 javier.hidalgo@raicestexas.org

## THE REFUGEE AND IMMIGRANT CENTER FOR EDUCATION AND LEGAL SERVICES (RAICES)

P.O. Box 786100

San Antonio, TX 78278

Telephone: (210) 469-4218

Telephone: (210) 469-4042

Facsimile: (210) 910-6588

### Kassandra Gonzalez

Texas Bar No. 24116439

### TEXAS CIVIL RIGHTS PROJECT

P. O. Box 17757

Austin, Texas 78760

(512) 474-5073 ext. 182

(512) 474-0726 (fax)

kassandra@texascivilrightsproject.org

### Erin D. Thorn

Texas Bar No. 24093261

### TEXAS CIVIL RIGHTS PROJECT

1017 W. Hackberry Ave.

Alamo, Texas 78516

(956)-787-8171 ext. 127

(512) 474-0726 (fax)

erin@texascivilrightsproject.org

### Jonathan Levy

Texas Bar No. 24087921

### AMERICAN GATEWAYS

314 E. Highland Blvd.

Austin, Texas 78752

(737) 356-3399

(512) 387-2650 (fax)

jonathanl@americangateways.org

Attorneys for Petitioner

### CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May 2025, I filed this document through the Court's CM/ECF filing system. In addition, a courtesy copy was e-mailed to Respondents' counsel at the address below:

Lacy L. McAndrew Assistant U.S. Attorney U.S. Attorney's Office 601 N.W. Loop 410, Suite 600 San Antonio, TX 78216-5597 lacy.mcandrew@usdoj.gov

Mary F. Kruger Civil Chief U.S. Attorney's Office 601 N.W. Loop 410, Suite 600 San Antonio, TX 78216-5597 mary.kruger@usdoj.gov

/s/ Kristy Blumeyer-Martinez
Kristy Blumeyer-Martinez
Attorney for Petitioner