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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

KONSTANTIN TIMOFEEV,)	
)	Case No. 3:25-cv-124
Petitioner,)	
)	
v.)	
)	
Leonard Oddo, Warden,)	
Moshannon Valley Processing Center;)	
Brian Mcshane,)	
Acting/Director of Philadelphia Field Office,)	
U.S. Immigration and Customs Enforcement;)	
Kristi Noem, Secretary of the U.S. Department of)	
Homeland Security; and Pamela Bondi,)	
Attorney General of the United States,)	
in their official capacities,)	
)	
Respondents.)	
_____)	

MOTION TO WITHDRAW PETITION FOR WRIT OF HABEAS CORPUS WITHOUT PREJUDICE

Petitioner, Konstantin Timofeev, by and through undersigned counsel, respectfully moves this Honorable Court for leave to withdraw the pending Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, **without prejudice**, and in support thereof states as follows:

1. Petitioner filed the above-captioned petition on April 24, 2025, seeking relief from ICE/immigration detention.
2. Petitioner now seeks to withdraw the petition **without prejudice** to preserve the ability to re-file after further factual or procedural developments.
3. This request is made in good faith and not for purposes of delay or harassment.
4. No prejudice will result to the Respondent by the granting of this motion.

WHEREFORE, Petitioner respectfully requests that this Court grant leave to withdraw the pending Petition for Writ of Habeas Corpus **without prejudice**, and that the case be closed administratively.

Respectfully submitted:
/s/ Alexander Narita
Law Offices of Alexander Narita, LLC
Alexander.narita@gmail.com

Date: June 25, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion to Withdraw Petition for Writ of Habeas Corpus Without Prejudice was served via on Defendants' Counsel David Lew via electronic filing on June 25, 2025.

/s/ Alexander Narita

Alexander Narita

Counsel for Petitioner