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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 JESUS DOMINGO-ROS, et al.,

12 Petitioners,

13 v.

14 GREGORY J. ARCHAMBEAULT; et
15 al.,

16 Respondents.

Case No.: 25-cv-1208-DMS-DEB

JOINT MOTION TO DISMISS

17
18 COME NOW THE PARTIES, Petitioners Jesus Domingo-Ros, Yoni Jacinto
19 Garcia, and Edwin Juarez-Cobon, by and through their counsel, Niels Frenzen and Jean
20 Reisz, and Respondents Gregory J. Archambeault, et al., by and through their counsel,
21 Adam Gordon, United States Attorney, and Erin Dimbleby and Lisa Hemann, Assistant
22 United States Attorneys, and hereby jointly move for dismissal of this matter. On May
23 19, 2025, Notices to Appear (“NTAs”) were issued as to each Petitioner, commencing
24 removal proceedings under 8 U.S.C. § 1229a, found in section 240 of the Immigration
25 and Nationality Act. Immigration and Customs Enforcement (“ICE”) and Customs and
26 Border Protection (“CBP”) have agreed to not place Petitioners in expedited removal
27 proceedings or subject Petitioners to an expedited removal order based on CBP’s April
28 22, 2025 encounter with Petitioners.

1 The parties jointly agree and stipulate to dismissal of this case without prejudice.
2 The parties further agree that each party will bear its own fees and costs of suit.

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5 DATED: May 22, 2025

s/ Niels W. Frenzen
NIELS W. FRENZEN
JEAN E. REISZ
Attorneys for Petitioners

8
9 DATED: May 22, 2025

ADAM GORDON
United States Attorney

10
11 s/Erin M. Dimbleby
ERIN M. DIMBLEBY
LISA HEMANN
Assistant U.S. Attorneys
Attorneys for Respondents

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15 **SIGNATURE CERTIFICATION**

16 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
17 and Procedures of the United States District Court for the Southern District of
18 California, I hereby certify that the content of this document is acceptable to Niels
19 Frenzen, counsel for Petitioners, and that I have obtained Mr. Frenzen's authorization
20 to affix his electronic signature to this document.

21 DATED: May 22, 2025

22
23 s/Erin M. Dimbleby
ERIN M. DIMBLEBY
Assistant United States Attorney