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Attorneys for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

K.M.G.,

Petitioner,

v.

CHRISTOPHER J. LAROSE, et al.,

Respondents.

Case No.: 3:25-cv-01356-DMS-VET

**STIPULATION OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE**

Petitioner K.M.G., by and through her counsel, Joshua A. Altman and Bashir Ghazialam, and Respondents, by and through their counsel, Erhan Bedestani, Trial Attorney, U.S. Department of Justice, hereby stipulate and agree as follows:

1. Under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), K.M.G.'s petition for a writ of habeas corpus under 28 U.S.C. § 2241 is voluntarily dismissed without prejudice and without fees or costs to any party;
2. Respondents agree to keep K.M.G. in the Southern District of California for the duration of her removal proceedings under 8 U.S.C. § 1229a, INA § 240; and
3. This stipulation is signed by all parties who have appeared in this action.

1 Respectfully submitted,

2 DATED: August 27, 2025

3 By: /s/ Joshua A. Altman
4 Joshua A. Altman

5 By: /s/ Bashir Ghazialam
6 Bashir Ghazialam

7 Attorneys for Petitioner

8 DATED: August 27, 2025

9 By: /s/ Erhan Bedestani
10 Erhan Bedestani
11 Trial Attorney

12 Attorney for Respondents

13 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
14 Policies and Procedures of the United States District Court for the Southern
15 District of California, I certify that the content of this document is acceptable to
16 counsel for Defendants and that I have obtained authorization from Erhan
17 Bedestani to affix his electronic signature to this document.

18 DATED: August 27, 2025

19 By: /s/ Joshua A. Altman
20 Joshua A. Altman

21 Attorney for Petitioner