

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DOUGLAS MENJIVAR,

Plaintiff,

v.

RANDALL TATE, BRET
BRADFORD, KRISTI NOEM, and
PAM BONDI,

Defendants.

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Civil Action No. 4:25-CV-02730

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Petitioner Douglas Menjivar and Defendants Randall Tate, Bret Bradford, Kristi Noem, and Pam Bondi (“Respondents”), by and through their undersigned counsel, hereby stipulate and agree to dismiss the above-captioned case without prejudice. Petitioner brought this action seeking to contest his removal prior to a hearing on his claim to withholding of removal. United States Immigration and Customs Enforcement (“ICE”) has since advised that it has no intention of removing Plaintiff until resolution of his pending claim to withholding of removal. The parties therefore agree that no justifiable controversy exists.

Accordingly, Petitioner and Respondents jointly stipulate to the dismissal of all claims by Petitioners in this case, without prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), with each side to bear their own costs and fees.

Dated: June 13, 2025

Respectfully submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on June 13, 2025, the foregoing was filed and served on all parties via the Court's CM/ECF service.

/s/ Shawn D. Ren
Shawn D. Ren
Assistant United States Attorney