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5 *Attorney for Petitioner*

6 **UNITED STATES DISTRICT COURT**  
7 **FOR THE WESTERN DISTRICT OF WASHINGTON**

8 **BHOLA PAGE,**

9 **Petitioner,**

10 **v.**

11 **THE GEO GROUP, INC., et al.,**

12 **Respondents.**

**CASE NO.: 2:25-cv-01108-JLR-TLF**

**PETITIONER'S RESPONSE TO  
RESPONDENTS' SUPPLEMENTAL  
BRIEF**

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15 Petitioner commenced this action by filing a Petition for Writ of Habeas Corpus on June  
16 13, 2025. Pet'r's Compl., ECF No. 1. On August 4, 2025, Respondents filed a Motion to Dismiss.  
17 Resp'ts' Mot. to Dismiss, ECF No. 6. On August 25, 2025, Petitioner filed a Response to  
18 Respondents' Motion to Dismiss, requesting that the Court deny the motion, grant the writ of  
19 Habeas Corpus, and order Petitioner's immediate release. Respondents filed their reply on  
20 September 2, 2025. Pet'r's Resp., ECF No. 11.

21 On October 8, 2025, the Court ordered the parties to submit supplemental briefs. Ct.'s  
22 Order, ECF No. 18. Respondents filed their additional brief on October 29, 2025, informing the  
23 Petitioner's Response to  
24 Respondents' Supplemental  
Brief

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1 Court that the Petitioner had been transferred to the Alexandria Staging Facility in Louisiana, that  
2 travel documents were issued on October 21, 2025, and that the Petitioner's removal was scheduled  
3 for the first week of November. Resp'ts' Suppl. Br., ECF No. 19, 20. On November 5, 2025,  
4 Petitioner, Bhola Page, was removed to India.

5 Through this reply, Petitioner respectfully notifies the Court that Petitioner no longer  
6 opposes Respondents' request to dismiss this action. Resp'ts' Mot. to Dismiss, ECF No. 6.  
7 Petitioner does, however, request that the dismissal be entered without prejudice. Accordingly,  
8 Petitioner respectfully requests that the Court enter an order dismissing this case without prejudice.

9  
10 On November 12, 2025,

Respectfully submitted,

11 By: s/Clayton Cook-Mowery  
12 Clayton Cook-Mowery  
13 Washington State Attorney ID: # 41110  
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*Attorney for Petitioner*

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*I certify that this dismissal contains 222  
words, in compliance with the Local Civil  
Rules.*

Petitioner's Response to  
Respondents' Supplemental  
Brief

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***Certificate of Service***

I hereby certify that on November 12, 2025, I electronically filed Petitioner’s Response to Respondents’ Supplemental Brief with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

NAME & ADDRESS	Method of Delivery
Michelle R. Lambert  <i>Attorney for Defendants</i>	<input checked="" type="checkbox"/> CM/ECF System <input type="checkbox"/> Electronic Mail <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Other: _____

By: s/Clayton Cook-Mowery  
Clayton Cook-Mowery

Petitioner’s Response to  
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