

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT OWENSBORO

GLADIS CHAVEZ-PINEDA

PETITIONER

v.

NO. 4:25-CV-49-RGJ

KRISTI NOEM, in her Official Capacity as
Secretary, Department of Homeland Security, et al.¹

RESPONDENTS

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Petitioner and Respondents hereby notify the Court that they stipulate to dismissal of this case. Petitioner's habeas petition is now moot because she has been released from federal custody and removed to Honduras, and there are no continuing collateral consequences from the challenged detention decision.

Respondents further state in response to the Court's text order [Doc. No. 15] that the Court's subject matter jurisdiction was not impacted — that is, the Court retained jurisdiction — after Petitioner was moved out of the Western District of Kentucky and while she remained in federal custody. *See White v. Lamanna*, 42 F. App'x 670, 671 (6th Cir. 2002).

WHEREFORE, the Court is informed that each party herein agrees to bear their own costs, expenses, and attorneys' fees.

¹ The undersigned is representing Kristi Noem and Samuel Olson, but 28 U.S.C. § 517 allows the Office of the United States Attorney to make appearances in court to attend to the United States' interests. Consistent with that statute, this filing attends to the United States' interests to the extent that the petition names Jason Woosley, the Grayson County Jailer, as a respondent.

Respectfully submitted,

<u>/s/ Charles Roth (with permission)</u> Daniel J. Canon Saeed & Little LLP #189-133 W. Market Street Indianapolis, Indiana 46204 (502) 396-3774 dan@slawfirm.com Charles Roth National Immigrant Justice Center 111 W. Jackson Blvd., Suite 800 Chicago, Illinois 60604 (312) 660-1613 croth@immigrantjustice.org <i>Counsel for Petitioner</i>	KYLE G. BUMGARNER United States Attorney, Western District of Kentucky <u>/s/ Timothy D. Thompson</u> Timothy D. Thompson Assistant United States Attorney 717 West Broadway Louisville, Kentucky 40202 Phone: (502) 582-6238 Timothy.thompson@usdoj.gov <i>Counsel for Respondents Kristi Noem and Samuel Olson</i>
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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2025, I electronically filed the foregoing with the clerk of the court through the CM/ECF system, which will send a notice of electronic filing to all registered filers.

/s/ Timothy D. Thompson
Timothy D. Thompson
Assistant United States Attorney