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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

ALBERT KHAMITOV

*Plaintiff*

v.

PAM BONDI, Attorney General of the  
United States in her official capacity;  
KRISTI NOEM, Secretary of the  
Department of Homeland Security in  
her official capacity; TODD LYONS,  
Acting Director of U.S. Immigration  
and Customs Enforcement in his  
official capacity; DREW BOSTOCK,  
Director of the Seattle Field Office of  
ICE's Enforcement and Removal  
Operations (ERO) in his official  
capacity; ARLANDO HERNANDEZ,  
Superintendent Anchorage  
Correctional Complex in his official  
capacity

*Defendants*

Case No. 3:25-cv-81-HRH

**MOTION TO  
WITHDRAW PETITION  
FOR HABEAS CORPUS  
WITHOUT PREJUDICE**



**MOTION TO WITHDRAW PETITION FOR HABEAS CORPUS**

COMES NOW, Petitioner, via the undersigned counsel, and respectfully moves to withdraw his petition for Habeas Corpus without prejudice.

1. Petitioner was moved from the Anchorage Correctional Complex (ACC) to the Northwest Immigration Processing Center (NWIPC) where he is now detained.
2. Petitioner instructed the undersigned that this petition should be withdrawn in the event of such a transfer.

WHEREFORE, Plaintiff respectfully requests that this Court dismiss his Habeas Corpus petition without prejudice.

RESPECTFULLY SUBMITTED this 20<sup>th</sup> day of June 2025,

/s/ Nicolás A. Olano  
Nicolás A. Olano

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*Attorney for Petitioner*