

NATIONS LAW GROUP  
Nicolás A. Olano  
Alaska Bar No. 2105042  
2525 Blueberry Road, Suite 207  
Anchorage, AK 99503  
Telephone: (907) 770-0909  
Fax: (907) 770-0902  
E-Mail: nicolas@nationslawak.com

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 Petitioner instructed the undersigned that this petition should be withdrawn in the event of such a transfer.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

Nations Law Group  
2525 Blueberry Road, Suite 207  
Anchorage, AK 99503  
*Attorney for Petitioner*