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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 Petitioner instructed the undersigned that this petition should be withdrawn in the event of such a transfer.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 20th day of June 2025,

/s/ Nicolás A. Olano
Nicolás A. Olano

Nations Law Group
2525 Blueberry Road, Suite 207
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Attorney for Petitioner