

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 25-CV-23014-MARTINEZ**

**MOEEN MEHRI-JAMILI,**

Petitioner,

v.

**PAMELA JO BONDI, U.S. Attorney General, et al.,**

Respondents.

/

**NOTICE OF RELEASE AND MOTION TO DISMISS WITHOUT PREJUDICE**

**NOTICE OF RELEASE**

Petitioner, Moeen Mehri-Jamili (“Petitioner”), by and through undersigned counsel, hereby notifies this Honorable Court that Petitioner has been released from the custody of the Department of Homeland Security (“DHS”). He is now home with his wife and family, making Thanksgiving even more special this year.

As the sole basis for the pending habeas petition was Petitioner’s detention, his release renders the habeas action moot, and no further judicial intervention is required at this time.

**MOTION TO DISMISS WITHOUT PREJUDICE**

Petitioner respectfully moves this Court to dismiss the instant Petition for Writ of Habeas Corpus without prejudice.

Dismissal without prejudice is appropriate because:

1. Petitioner has obtained the relief sought—release from custody—thereby mooting the case; and

2. Future changes in enforcement or custody status may warrant renewed habeas intervention, and therefore, the interests of justice require that dismissal be without prejudice.

**WHEREFORE**, Petitioner respectfully requests that this Honorable Court enter the attached Proposed Order dismissing this action without prejudice and closing the case.

Dated this 21<sup>st</sup> day of November 2025.

/S/Linda Osberg-Braun  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served through the CM/ECF System on November 21<sup>st</sup>, 2025.

By: /S/Linda Osberg-Braun  
Linda Osberg-Braun