

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

K.E.G.M. (age eleven), *et al.*,

Petitioners-Plaintiffs,

v.

Doe #1, *et al.*,

Respondents-Defendants.

Case No. 1:25-cv-02215

**PETITIONERS-PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Petitioners-Plaintiffs K.E.G.M. (age eleven) and Ms. M. ("Petitioners") hereby notify the Court that Petitioners voluntarily dismiss this matter, without prejudice, against all Respondents-Defendants ("Respondents"). Respondents have not answered the Petition and Complaint or moved for summary judgment on any of the claims asserted therein. Therefore, Petitioners' dismissal of this action is permitted by Rule 41(a)(1)(A)(i) without a Court order.¹

Petitioners further assert as follows:

1. This case concerns the illegal courthouse arrest and the illegal subsequent detention of Petitioners: K.E.G.M., an eleven-year old girl, and her mother Ms. M. (collectively, "the family").

¹ On July 14, 2025, the Court issued a Notice of New Case Error on the docket, requiring that Petitioners attach a corrected pleading with the name and full residence address of each party. Because Petitioners do not request that the case proceed any further, Petitioners are not filing a corrected pleading.

2. This law-abiding family was illegally and unconstitutionally arrested and detained at an Immigration Court in Los Angeles on May 29, 2025, after they dutifully attended a routine immigration hearing. The family was subsequently detained at the Dilley Immigrant Processing Center in Texas for more than a month.

3. On Friday, July 11, 2025, undersigned counsel became aware that K.E.G.M. and her mother Ms. M. were no longer imprisoned at the Dilley Immigration Processing Center.

4. Throughout July 11 and July 12, 2025, K.E.G.M. and Ms. M.'s family members had no information about K.E.G.M. and Ms. M.'s whereabouts and were extremely worried about them.

5. Throughout the day and evening of July 11, 2025, the ICE Detainee Locator indicated that Ms. M. was detained in "DC," meaning in Washington, D.C.

6. Undersigned counsel accordingly filed a habeas petition in this Court on July 11, 2025, to challenge the unlawful and unconstitutional arrest, detention, and imminent removal of K.E.G.M. and Ms. M.

7. Immediately after filing the habeas petition and related documents, undersigned counsel sent an email at 9:17 p.m. ET on July 11, 2025 to Brian Hudak, Chief of the Civil Division of the U.S. Attorney's Office in Washington, D.C., and three of his colleagues. Undersigned counsel requested the government's assistance "with ensuring that the Petitioners remain in the United States and in Washington, D.C., while the instant action is pending before federal courts." Undersigned counsel's email also attached all the court filings in this case and provided the Petitioners' full names and A numbers, so that the government could easily ensure that they were not wrongfully removed from the United States.

8. Undersigned counsel received no response from the government attorneys on July 11 or July 12, 2025.

9. On July 13, 2025 at 12:03 a.m. ET, undersigned counsel sent an email to Mr. Hudak and three of his colleagues, stating: “The ICE Detainee Locator no longer indicates the whereabouts of Ms. M. and K.E.G.M. Their family members have not heard from them and they are extremely worried. Can you please confirm Ms. M. and K.E.G.M.'s whereabouts? Given that K.E.G.M. is a young girl, only 11-years old, we would be especially grateful for your assistance.”

10. Mr. Hudak subsequently responded at 1:30 p.m. on July 13, 2025, stating that the family had been removed to Honduras the previous day. Mr. Hudak also stated: “Before their removal, neither plaintiff was located in the District of Columbia. They were instead housed by the Juvenile and Family Management Division in Phoenix, AZ and Harlingen, TX.”

11. The inability of family members or undersigned counsel to contact the Petitioners, the information on the ICE Detainee Locator (stating that the family was in “DC”), Respondents’ decision to deport Petitioners on a Saturday, and the timing of Mr. Hudak’s email response (sent only after the family had been deported) made it exceedingly difficult, if not impossible, for undersigned counsel to file a federal habeas petition for the family in the appropriate jurisdiction in time to try to stop their wrongful imminent deportation from the United States.

12. Under these circumstances, and with regret, Petitioners file this Notice of Voluntary Dismissal Without Prejudice.

Dated: July 14, 2025

/s/ Amber Qureshi

Amber Qureshi (DC Bar No. 90001046)
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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

Dated: July 14, 2025

Respectfully submitted,

/s/ Amber Qureshi

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