

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

LEONARDO S.,
Petitioner,

v.

UNITED STATES IMMIGRATION AND,
CUSTOMS ENFORCEMENT, *et al.*
Respondents.

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CIVIL ACTION NO. 1:25-cv-00158

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure of 41(a)(1)(A)(ii), Plaintiff, Leonardo S., and Respondents, U.S. United States Immigration and Customs Enforcement, and Carlos D. Cisneros, Assistant Field Office Director-Port Isabel Detention Center (collectively, hereafter “the Parties”), by and through their undersigned counsel, hereby stipulate and agree to dismiss the above captioned action with prejudice. Petitioner was removed to Venezuela on May 29, 2025, and is no longer in the custody of U.S. Immigration and Customs Enforcement (“ICE”), U.S. Department of Homeland Security (“DHS”). Therefore, the Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241 is moot.

The Parties have agreed that each side shall be their own costs and fees related to litigation of this action and that Plaintiff will not initiate any litigation for attorney’s fees or costs under the Equal Access to Justice Act, or any other statute, rule, or legal doctrine.

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Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney
Southern District of Texas

s/ Franklin S. Montero with permission
Franklin S. Montero
Law Offices of Franklin S. Montero, LLC
451 Clifton Avenue
Clifton, NJ 07011
Phone: (973) 777-8718
Fax: (973) 777-1710
Bar No.:
Bar No.
E-mail: Montero@FMonterolaw.com
COUNSEL FOR PETITIONER

s/Baltazar Salazar
Baltazar Salazar
Assistant United States Attorney
S.D. Tex. ID No. 3135288
Texas Bar No. 24106385
UNITED STATES ATTORNEY'S OFFICE
SOUTHERN DISTRICT OF TEXAS
600 E. Harrison Street, Suite 201
Brownsville, Texas 78520
Tel: (956) 983-6057
Fax: (956) 548-2775
E-mail: Baltazar.Salazar@usdoj.gov
COUNSEL FOR RESPONDENTS

CERTIFICATE OF SERVICE

I, Baltazar Salazar, hereby certify that on August 27, 2025, a copy of the foregoing document was served on counsel for Petitioner via S.D. Tex. CM/ECF email notification.

s/Baltazar Salazar
Baltazar Salazar
Assistant United States Attorney