

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Tou Pao Lee,

Petitioner,

v.

PAMELA BONDI,
ATTORNEY GENERAL;
KRISTI NOEM,
SECRETARY OF THE DEPARTMENT OF
HOMELAND SECURITY;
RYAN SHEA,
FREEBORN COUNTY SHERIFF
TODD M. LYONS,
DIRECTOR OF ICE FOR THE WASHINGTON,
D.C. HEADQUARTERS

Respondents

Case No. 0:25-CV-02926-PJS-SGE

PETITIONER'S MOTION TO DISMISS THE WRIT OF HABEAS CORPUS

Petitioner seeking dismissal without prejudice of this action under Fed. R. Civ. P. 41(a)(2). Petitioner filed a petition for a Writ of Habeas Corpus based on Zadvydas v. Davis, 533 U.S. 678 (2001) on July 18, 2025. Dkt. 1. On August 1, 2025 Respondents filed a Declaration from Officer Joh D. Ligon claiming that DHS has travel documents for Petitioner. Dkt. 20. After a show cause hearing on August 25, 2025, Respondents provided a copy of the travel documents to this Honorable Court in camera memorialized by a letter filed with this Honorable Court. Dkt. 31. Thereafter the Honorable Chief Judge Schlitz ordered Respondents to provide a status update regarding Petitioner's removal from the U.S. on or before September 9, 2025. Dkt. 33. Respondents provided such a status updated informing this Honorable Court and Petitioner's counsel that Petitioner was removed to Laos. Dkt. 34.

Since Petitioner is no longer in the custody of the United States and has been removed to Laos, Petitioner recognizes that these proceedings are now moot. Accordingly, Petitioner requests that this Honorable Court dismiss this action without prejudice..

Respectfully submitted,
The Petitioner,
By his Attorney,

/s/Patrick J. McKeon
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