

Christopher Godshall-Bennett
Eric Lee
LEE & GODSHALL-BENNETT LLP
712 H St. NE, Unit 5019
Washington, DC 20002
chris@leegodshallbennett.com
eric@leegodshallbennett.com
T: (202) 240-8496

Mindy Butler-Christensen
ENCANTO LAW, LLC
20 E. Thomas Rd., Ste. 2200
Phoenix, AZ 85012
mindy@encantolaw.com
T: (602) 848-0207

Rekha Nair
PHOENIX LEGAL ACTION NETWORK
P.O. Box 33364
Phoenix, AZ 85067
rekha@planphx.org
T: (602) 341-3457

Attorneys for Petitioner-Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Mirta Amarilis Co Tupul,

Petitioner-Plaintiff,

v.

Kristi Noem, et al.

Respondents-Defendants.

Case No. 2:25-cv-02748-DJH--JZB

**JOINT STIPULATION OF
DISMISSAL WITHOUT
PREJUDICE**

After the filing of this action, Immigration and Customs Enforcement ("ICE") issued Petitioner-Plaintiff Mirta Amarilis Co Tupul a Notice to Appear ("NTA"), transferring her from expedited removal proceedings to "240" removal proceedings.

ICE has agreed that Ms. Co Tupul shall not be placed into expedited removal proceedings while she remains physically present in the United States. ICE reserves the

right to place Ms. Co Tupul into expedited removal proceedings if she (1) departs the United States, (2) subsequently reenters the United States without being admitted or paroled by an immigration officer; and (3) is encountered by an immigration officer within two years of her most recent unlawful entry into the United States.

As such, Petitioner-Plaintiff Mirta Amaralis Co Tupul, by and through her undersigned counsel, and Respondents-Defendants Kristi Noem, Pamela Bondi, Todd M. Lyons, John Cantu, and Fred Figueroa, by and through their undersigned counsel, and, being all of the parties to this action, jointly stipulate and agree pursuant to Rule 41(a) of the Federal Rules of Civil Procedure that this action, and each and every count and claim asserted therein, be dismissed without prejudice, each party to bear their own costs, expenses, and fees.

Respectfully submitted this 13th day of August 2025,

LEE & GODSHALL-BENNETT LLP

By: /s/ Christopher Godshall-Bennett
Christopher Godshall-Bennett

Attorney for Petitioner-Plaintiff MIRTA
AMARALIS CO TUPUL

TIMOTHY COURCHAIINE

United States Attorney
District of Arizona

By: /s/ Katherine R. Branch
Katherine R. Branch

Attorney for Respondents-Defendants
KRISTI NOEM, PAMELA BONDI,
TODD M. LYONS, JOHN CANTU, and
FRED FIGUEROA