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Attorney for Petitioner

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**D-J-R-T-,**

**Case No.: 3:25-cv-01463-JR**

Petitioner,

**NOTICE OF VOLUNTARY DISMISSAL**

v.

**DREW BOSTOCK; TODD LYONS; U.S.  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT; KRISTI NOEM; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,**

Respondents.

Petitioner, through counsel, hereby moves to voluntarily dismiss the above proceedings without prejudice.

This is a habeas case arising under 28 U.S.C. § 2241 in which the Petitioner challenges his detention on constitutional and statutory grounds. Petitioner is a citizen of Venezuela who was detained by immigration authorities on August 18, 2025, in Portland, Oregon. The habeas petition initiating this action was filed at 3:45 p.m. on August 18, 2025. ECF 1. In an email to prior Counsel John Marandas and Caroline Keating Medeiros, Counsel for the Respondent sent records confirming that Petitioner was not in the state of Oregon at the time of the filing of the

petition and, instead, was in the state of Washington. For this reason, Petitioner intends to refile the petition in the Western District of Washington.

Thus, pursuant to Federal Rule of Civil Procedure 41(a), Petitioner hereby voluntarily dismisses this case without prejudice.

Respectfully submitted this 27<sup>th</sup> day of August, 2025.

/s/ Julia M Braker  
Julia M Braker  
CLEAR Clinic  
Counsel for Petitioner