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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF ARIZONA**

8
9 Ali Hamed Al Bazergan,
10 Petitioner,
11 v.
12 Donald J. Trump, *et al.*,
13 Respondents.

No.: CV-25-03171-PHX-JJT (JFM)

Unopposed Motion to Dismiss

Agency Doc. No.





14
15
16 Petitioner Ali Hamed AL BAZERGAN (“AL BAZERGAN”), through his counsel
17 of record, respectfully requests that the court dismiss this unopposed petition without
18 prejudice, per the following:

19
20 WHEREAS on September 19, 2025, Honorable Judge Tuchi ordered Respondents
21 to immediately release AL BAZERGAN from immigration detention under the same
22 conditions that were in place prior to his re-detention, and enjoined Respondents from
23 continuing to detain AL BAZERGAN as they sought another country that would accept
24 him on removal;
25

26 WHEREAS on September 20, 2025, Respondents released AL BAZERGAN;

27 WHEREAS Respondents outfitted AL BAZERGAN with an ankle monitor;
28

1 WHEREAS on October 16, 2025, Respondents provided AL BAZERGAN with the
2 ICE Form I-210 Voluntary Departure and Verification of Departure for AL BAZERGAN
3 to depart the United States (*Exhibit A*);
4

5 WHEREAS on October 18, 2025, AL BAZERGAN left the United States via flight
6  (Tucson, AZ to Los Angeles International Airport) and  (Los Angeles
7 International Airport to Doha, Qatar) (*Exhibit A*);
8

9 WHEREAS on October 19, 2025, AL BAZERGAN'S wife confirmed to
10 undersigned counsel that he arrived at his final destination and is no longer in the United
11 States;
12

13 WHEREAS AL BAZERGAN no longer seeks to pursue the remaining claims
14 present before the Court;

15 WHEREAS Assistant U.S. Attorney Brock Heathcotte informed undersigned
16 counsel that he does not oppose this Motion for voluntary dismissal (*Exhibit B*); and
17

18 WHEREFORE, pursuant to this motion being unopposed, Petitioner Ali Hamed AL
19 BAZERGAN respectfully requests that the Court enter an order dismissing the matter
20 without prejudice pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(i).
21

22
23 Dated: October 24, 2025

Respectfully submitted,

24
25 By: /s/Ginger E. Jacobs
26 Ginger E. Jacobs
27 Attorney for Petitioner
28 E-mail: ginger@jsslegal.com