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Attorneys for Respondents

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

PEDRO PABLO EXPOSITO,

Petitioner,

vs.

KRISTI NOEM, et al.,

Respondents.

Case No. 25cv2399 RSH DEB

JOINT MOTION TO DISMISS

Whereas, on October 6, 2025, Petitioner was granted the relief he sought in his removal proceedings and was released from custody on that same day, the parties hereby move to dismiss this case without prejudice pursuant to Fed. R. Civ. P. 41(a)(2) and stipulate that both parties will bear their own costs. *See Ziganshin v. U.S. Dep't of Homeland Sec.*, No. 3:25-CV-01096-RBM-SBC, 2025 WL 2576484, at *1 (S.D. Cal. Aug. 20, 2025) (citing and quoting *Smith v. Allen*, No. 1:23-cv-00480-ADA-HBK (HC), 2023 WL 5745898, at *1 (E.D. Cal. Sept. 6, 2023), *report and recommendation adopted*, 2024 WL 1219176 (E.D. Cal. Mar. 21, 2024) (citing *Stevedoring Servs. of Am. v. Armilla Int'l B.V.*, 889 F.2d 919, 921 (9th Cir. 1989))).

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1 DATED: October 7, 2025

ALEX MONSALVE LAW FIRM, PC

2 *s/ Alejandro Monsalve*
3 ALEJANDRO MONSALVE

4 Counsel for Petitioner

5 DATED: October 7, 2025

6 ADAM GORDON
United States Attorney

7 *s/ Samuel W. Bettwy*
8 SAMUEL W. BETTWY
9 Assistant U.S. Attorney

10 Attorneys for Respondents

11 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and
12 Procedures of the United States District Court for the Southern District of California, I
13 certify that the content of this document is acceptable to counsel for Plaintiff and that I have
14 obtained implicit authorization to affix the electronic signature of Alejandro Monsalve to
15 this document.

16 DATED: October 7, 2025

17 ADAM GORDON
United States Attorney

18 *s/ Samuel W. Bettwy*
19 SAMUEL W. BETTWY
20 Assistant United States Attorney

21 Attorneys for Respondents
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