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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

PEDRO PABLO EXPOSITO,

Case No. 25cv2399 RSH DEB

Petitioner,

JOINT MOTION TO DISMISS

vs.

KRISTI NOEM, et al.,

Respondents.

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
7 United States Attorney

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

11 Attorneys for Respondents

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

17 DATED: October 7, 2025

18 ADAM GORDON
19 United States Attorney

20 *s/ Samuel W. Bettwy*
21 SAMUEL W. BETTWY
22 Assistant United States Attorney

23 Attorneys for Respondents