

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

<p>MICHAEL ALEXANDER CHACON RIOS, <i>Petitioner,</i></p> <p style="text-align: center;">v.</p> <p>MIKE LEWIS, <i>et al.,</i> <i>Respondents.</i></p>	<p>Case No. 4:25-cv-00108-RGJ</p>
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PETITIONER’S UNOPPOSED MOTION FOR VOLUNTARY DISMISSAL

Petitioner, Michael Alexander Chacon Rios, by and through his undersigned counsel, hereby moves for voluntary dismissal of his Petition for a Writ of Habeas Corpus, filed before this Court on September 18, 2025. Dkt. 1. Petitioner files this motion pursuant to Fed. R. Civ. P. 41(a)(2).

At the time Petitioner filed his habeas petition, the decision in *NTPSA v. Noem*, No. 25-cv-01766, 2025 WL 2578045 (N.D. Cal. Sep. 5, 2025), setting aside the federal government’s attempt to end Temporary Protected Status (TPS) for Venezuela, remained in effect. Pursuant to that decision, Petitioner argued that his detention was unlawful under 8 U.S.C. 1254a(d)(4) as a TPS beneficiary. Dkt. 1. However, on October 3, 2025, after this matter was fully briefed, the Supreme Court stayed the district court’s decision “as to the Venezuela vacatur and Venezuelan termination” and “pending disposition of the Government’s appeal in the United States Court of Appeals for the Ninth Circuit and disposition of a petition for a writ of certiorari, if such writ is timely sought.” *Noem v. Nat’l TPS All.*, No. 25A326, 606 U.S. ---, 2025 WL 2812732 (U.S. Oct. 3, 2025). Because the Supreme Court has stayed the district court decision giving rise to Petitioner’s habeas petition, he respectfully moves to voluntarily dismiss his petition without prejudice.

On October 10, 2025, Petitioner, through undersigned counsel, contacted opposing counsel at the U.S. Attorney's Office and informed them of her intent to seek voluntary dismissal. Respondents do not oppose this motion for voluntary dismissal.

WHEREFORE, Petitioner hereby moves this Court to voluntarily dismiss his Petition for Writ of Habeas Corpus without prejudice, as set forth above.

Dated: October 14, 2025

s/ Colleen Cowgill

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CERTIFICATE OF SERVICE

I, Colleen Cowgill, hereby certify that on October 14, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notice of filing to all parties receiving electronic notice.

s/ Colleen Cowgill
Attorney for Petitioner