

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

4 BERNIS SANTIAGO RIVERA-CRUZ,

5 Petitioner,

6 v.

7 SAMUEL OLSON, et al.,

8 Respondents.
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Case No. 1:25-cv-1250

Honorable Robert J. Jonker

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MOTION TO WITHDRAW

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2 NOW COMES Petitioner, by and through undersigned counsel, and respectfully
3 withdraws the Motion for Immediate Release, filed on December 10, 2025. The basis for the
4 original motion has been resolved. The Immigration Judge has now issued a decision denying
5 bond, concluding that Petitioner failed to establish he is not a flight risk despite the absence of
6 any evidence supporting that finding. Petitioner anticipates filing an appropriate motion
7 addressing the deficiencies in the Immigration Judge's decision.
8 A copy of the Immigration Judge's order is attached for this Court.

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10 Dated: December 10, 2025

Respectfully Submitted by:

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12 /s/ William A. Quiceno

13 Kempster, Corcoran, Quiceno &
14 Lenz- Calvo, Ltd.
15 332 S. Michigan Avenue, Suite 1428
16 Chicago, IL 60604
17 (312) 341-9730
18 Atty. Code: 6243695
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