

All parties who have appeared, by and through undersigned counsel, respectfully submit this stipulated notice of voluntary dismissal without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). In support of this notice, parties respectfully submit the following:

On December 14, 2022, petitioner Yeison Eduardo Molina Trejo (“Petitioner”) was ordered removed *in absentia* from the United States. On October 17, 2025, Petitioner filed an emergency temporary restraining order and petition for writ of habeas corpus with the U.S. District Court for the District of Vermont. The emergency restraining order was granted and has been in place for Petitioner since October 17, 2025, declaring that Petitioner be held at the Northwest State Correctional Facility in St. Albans, Vermont pending decision on the underlying habeas petition. A habeas hearing was scheduled for November 7, 2025, but was continued to November 10, 2025 for reasons unrelated to the merits of the habeas petition.

On October 20, 2025, Petitioner filed a motion to reopen proceedings with the immigration court. On November 2, 2025, Petitioner’s motion to reopen in front of the Executive Office for Immigration Review (EOIR) was denied by Immigration Judge Sam Brown IV in the Houston Immigration Court. Petitioner understands that, due to the denial of the motion to reopen, Petitioner will be removed from the United States. While Petitioner was born in Honduras, Petitioner requested on November 6, 2025 that DHS designate Mexico as their country of removal rather than Honduras. Petitioner makes the following assertions:

- Petitioner may be removed to Mexico pursuant to 8 USC § 1231(b)(1)(B) (allowing removal to a contiguous territory where non-citizen entered through that territory and is a subject of or resides in that territory).
- On February 4, 2021, Petitioner was granted asylum in Mexico due to persecution suffered in Honduras. Exh. M, Certificate of Recognition of Refugee Status with certified translation. Petitioner received a Mexican permanent resident card on April 20, 2021. Exh. N, Petitioner Mexican Permanent Resident Card. The card does not

appear to have any expiration date.

- Petitioner entered the United States via Mexico around November 2022. If, for any reason, DHS determines 8 USC § 1231(b)(1)(B) does not apply to Petitioner, Petitioner may also be removed to Mexico pursuant to 8 USC § 1231(b)(2)(B) (allowing removal to a contiguous territory when non-citizen designates that territory and is a subject of or has resided in that territory).

On November 7, 2025, ERO offered to consider removing Petitioner to Mexico in lieu of Honduras, should Petitioner agree to voluntarily dismiss their habeas petition. On November 8, 2025, Petitioner agreed, and asked that in return, a good faith effort be made by the Enforcement and Removal Operations division of Immigration and Customs Enforcement to effectuate Petitioner's removal to Mexico.

For these reasons, the Petitioner joins Respondents in voluntarily dismissing this case without prejudice, so as to not constitute the dismissal as a final judgment rendered on the merits of any issue in these proceedings.

Dated this 9th day of November 2025.

Respectfully submitted,
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