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14 **UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

16 V- B-,

17 Petitioner,

18 v.

19 JOHN MATTOS, Warden, Nevada Southern
20 Detention Center;
21 ROBERT CULLEY, Field Office Director of the
22 Las Vegas Field Office, Immigration and Customs
23 Enforcement and Removal Operations;
24 JASON KNIGHT, Director of the U.S.
25 Immigration and Customs Enforcement Field
26 Office, Salt Lake City;
27 TODD LYONS, Acting Director U.S.
28 Immigrations and Customs Enforcement; and
KRISTI NOEM, Secretary, U.S. Department of
Homeland Security, *in her official*
capacity;
PAMELA BONDI, Attorney
General of the United States,

Respondents.

Civil Action No: 25-cv-02085

**NOTICE OF VOLUNTARY
DISMISSAL OF THIS ENTIRE
CASE**

1 **PETITIONER’S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

2
3 NOW COMES, V- B- (hereinafter “Petitioner V- B-” or “Petitioner”), by and through the
4 undersigned attorney in the above cause gives notice to this Honorable Court to voluntarily
5 dismiss his complaint pursuant to Federal Rules of Civil Procedure Rule 41(a)(1)(A)(i) against
6 Defendants John Mattos, Robert Culley, Jason Knight, Todd Lyons, Kristi Noem, and Pamela
7 Bondi, and in support thereof states as follows:
8

- 9 1. On October 25, 2025, Petitioner V- B- filed a Petition for Writ of Habeas Corpus
10 against John Mattos, Robert Culley, Jason Knight, Todd Lyons, Kristi Noem, and
11 Pamela Bondi, asserting certain alleged violations under the law, which have been
12 pending before this court.
13
14 2. On November 4, 2025, the Immigration Judge granted the Petitioner’s application for
15 asylum and relief from removal, and the Department of Homeland Security waived its
16 right to appeal.
17
18 3. The Petitioner has been released from custody as a result of the grant of asylum and
19 relief from removal.
20
21 4. Therefore, the issue is moot and Petitioner V- B- has decided to voluntarily move to
22 dismiss all his claims against all Defendants.
23
24 5. There are no counterclaims in the instant action by any of the Defendants against the
25 Petitioner.
26
27 6. Defendants have not answered or moved for summary judgment.

28 WHEREFORE, Plaintiff V- B- here respectfully gives notice to the Court of his voluntary
dismissal of all his claims and causes of action against Defendants John Mattos, Robert Culley,

1 Jason Knight, Todd Lyons, Kristi Noem, and Pamela Bondi pursuant to Fed. R. Civ. P.
2 41(a)(1)(A)(i) without prejudice.
3
4

5 Dated: November 7, 2025

6 Respectfully submitted,
7 V- B-,
8

9 /s/ V- B-

10 By his local Counsel:

11 */s/Hardeep Sull*
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17 By his attorney:

18 /s/ Julia Bikbova
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