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14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 SALVADOR ESCALERA JAIME,
17 Petitioner,
18 v.
19 CHRISTOPHER LAROSE; et al.,
20 Respondents.

21 Case No.: 25-CV-2943 JLS (MMP)

22 **JOINT MOTION TO DISMISS**

23 Petitioner Salvador Escalera Jaime, by and through his counsel, William J. Baker,
24 and Respondents Christopher J. LaRose, et al., by and through their counsel, Adam
25 Gordon, United States Attorney, and Betsey Boutelle, Assistant United States Attorney,
26 hereby jointly agree and stipulate to dismissal of this case without prejudice. The parties
27 further agree that each party will bear its own fees and costs of suit.

28 DATED: November 4, 2025

s/ William J. Baker
WILLIAM J. BAKER
Attorney for Petitioner

29 DATED: November 4, 2025

30 ADAM GORDON
31 United States Attorney
32 s/ Betsey Boutelle
33 BETSEY BOUTELLE
34 Assistant U.S. Attorney
35 Attorneys for Respondents

1 **SIGNATURE CERTIFICATION**

2 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
3 and Procedures of the United States District Court for the Southern District of
4 California, I hereby certify that the content of this document is acceptable to counsel
5 for Petitioner, and that I have obtained authorization to affix Petitioner's counsel's
6 electronic signature to this document.

7 DATED: November 4, 2025

8 *s/Betsey Boutelle*
9 BETSEY BOUTELLE
10 Assistant United States Attorney

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