

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

M.M., *Plaintiff*,

File No. 1:25-cv-03880

vs.

NOTICE OF VOLUNTARY DISMISSAL

F. R. Civ. P., Rule 41(a)(1)

KRISTI NOEM, TODD LYONS,
PAMELA BONDI, and MARCO
RUBIO, *Defendants*.

Notice of Voluntary Dismissal

The Plaintiff respectfully gives notice of his Voluntary Dismissal of this civil action, without prejudice, by right, under F. R. Civ. P., Rule 41(a)(1)(A)(i), now dismissing all pending claims against all Defendants, and further shows as follows:

1. The Complaint in this civil action was brought on November 6, 2025, to challenge Plaintiff's unlawful removal to Ghana, and likely chain refoulement to his country of origin, the Gambia, in violation of regulation, law, treaty, and the Constitution.
2. Plaintiff was permitted to proceed pseudonymously, and his true identity was provided in sealed filing, ECF # 5.
3. Defendants filed a Status Update on November 6, 2025 (ECF#17) which correctly noted the fact that Plaintiff had by then reached Ghana, and was no longer in the custody of the Defendants. Said update further suggested mootness of the Plaintiff's claims.
4. Plaintiff remains aggrieved by the acts heretofore complained-of, and does not concede that his matter would rightly be dismissed on either the merits nor the procedural issues cited by Defendants.

5. Nevertheless, at this juncture, Plaintiff further wishes to voluntarily dismiss his claims against all Defendants, without prejudice.¹
6. There are no pending counterclaims by Defendants, and Defendants have not filed any Answer.
7. Plaintiff was a civil detainee who was indigent and sought to proceed *in forma pauperis*. That request was denied, without prejudice, as counsel had been unable to obtain and provide complete information on his finances under the given time constraints. A new Motion to Appear *In Forma Pauperis* has been filed, ECF # 18, seeking to cure that deficiency. The issue of the filing fee is an issue just between the Plaintiff and the Court, not involving Defendants or the claims being dismissed herein; however, it would be Plaintiff's desire to resolve that issue to avoid any disrespect to the Court or incurring any debt.

WHEREFORE, undersigned counsel respectfully requests that the Court accept this Notice, and note on the docket that all claims against the Defendants have been Voluntarily Dismissed without Prejudice, pursuant to the provisions of Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure.

Respectfully submitted, this the 7th day of November, 2025.

by: /s/ Derrick J. Hensley
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¹ This may also be construed as a motion or request to withdraw the pending, unresolved motions, i.e., the motion for an emergency ex parte TRO (ECF #2, amended at #11), and the three Motions for Admission Pro Hac Vice (ECF #'s 6-7 and 9, and amendments at #'s 14-15).

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and

/s/ Derrick J. Hensley (on behalf of the following)

Aimee Mayer-Salins*

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**Motions for admission pro hac vice withdrawn*

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have filed the foregoing using the CM/ECF system, which will send a notice of this filing to counsel for Defendants.

Dated: 11/7/2025

/s/ Derrick J. Hensley
Counsel for Plaintiff