

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**MARILYN MICHELLE
RIVERA AGUILAR,**

Petitioner,

v.

**KRISTI NOEM, Secretary
U.S. Department of Homeland Security, et al.,**

Respondents.

Case No. 1:25-cv-03658-BAH

**JOINT STATUS REPORT AND
STIPULATION OF VOLUNTARY DISMISSAL**

The Parties hereby submit this Joint Status Report to advise the Court of recent developments and to ask that this matter be dismissed, without prejudice.

1. November 6, 2025, Petitioner was detained by officers from the Enforcement and Removal Operations (ERO) team in the Baltimore Field Office of the U.S. Department of Immigration and Customs Enforcement (ICE) based on their records which showed that she had violated the terms of her Alternative to Detention (ATD) Agreement.

2. On November 7, 2025, her attorney filed a Habeas Petition and Motion for Temporary Restraining Order (TRO) with this Court. A telephonic hearing was held that same day, and the Motion for TRO was Denied. ECF 1, 2.

3. After the hearing the Court entered two paperless orders requiring that the parties file a status report regarding petitioner's removal proceeding, her ATD violations, and her eligibility for a bond hearing, as well as a proposed briefing schedule. ECF 8, 9.

4. The parties conferred several times and sought additional time to provide the information requested by the Court and submit a proposed briefing schedule. ECF 11-16.

5. Petitioner's counsel asked if Respondents would be willing to agree to Petitioner's temporary release to allow her to arrange her affairs, after which she would voluntarily depart the United States to Honduras.

6. On November 19, 2025, counsel for Respondents advised Petitioner's counsel that ICE would agree to release Petitioner for forty-five (45) days to permit preparation for voluntary departure to Honduras on the following terms.

- a. Petitioner will file a motion with the Immigration Court where her removal proceeding is pending seeking to withdraw and/or cancel her asylum application;
- b. Once that motion has been granted, Petitioner will be released from her current detention in Louisiana, and immediately placed in ICE's Alternative to Detention (ATD) program with global positioning system (GPS) tracking that must be worn at all times, and will comply with the terms of that program;
- c. Within two weeks of her release, Petitioner will report to ERO at the Baltimore Field Office;
- d. If necessary, Petitioner will take steps to ensure she secures any and all required travel documents for travel to Honduras;
- e. Within 45 days of her release, Petitioner will voluntarily depart to Honduras, and as part of this agreement, confirms she will not assert a fear of removal to Honduras;
- f. If Petitioner fails to voluntarily depart to Honduras within 45 days of her release, she will be re-detained, and ICE will resume efforts to remove her to Honduras.

7. In light of the parties' agreement to the terms set forth above, the parties agree that this case should be voluntarily dismissed without prejudice in accordance with the attached proposed order, which provides that either party can move to reopen this proceeding if these terms are not met.

WHEREFORE, for the reasons sent forth above the parties request that this Court approve the status report and enter the attached proposed order of dismissal.

Dated: November 20, 2025

Respectfully submitted,

/s/ Ariana Wright Arnold
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CERTIFICATE OF SERVICE

This Joint Status Report and Motion for Voluntary Dismissal was filed with the Court's CM/ECF system and thereby served on counsel of record in this case.

/s/ Ariana Wright Arnold
Ariana Wright Arnold