

Petitioner, German Hernandez Flores, by and through undersigned counsel, respectfully moves this Court to dissolve the Court's previous grant of a Temporary Restraining Order [Doc. 4] and withdraw the previously filed Motion to Transfer Petition [Doc.14]. On December 1, 2025, Texas-based immigration court ordered the Petitioner's voluntary deportation (Ex. A) and upon information and belief he was removed from the United States on December 4, 2025.

For the foregoing reasons, Petitioner respectfully requests that this Court grant this Motion to Dissolve the Temporary Restraining Order and Withdraw the Motion to Transfer the Petition, and dismiss this matter without prejudice. This request is made in good faith and after agreement with opposing counsel.

Respectfully submitted,

/s/ Katherine H. Blankenship
Katherine H. Blankenship, (FL 1031234)
Sanctuary of the South, PLLC
PO Box 847
Murfreesboro, TN 37133-0847
786-671-8133
Email: katie@sanctuaryofthesouth.com

Brett F. Stokes , Esq.
Vermont Law School
P.O. Box 1404
Burlington, VT 05402
802-558-7732
Email: bstokes@vermontlaw.edu
Attorneys for Petitioner

Certificate of Service

I hereby certify that on 12/04/2025, a true and correct copy of the foregoing Motion to Dissolve the Temporary Restraining Order and Withdraw the Motion to Transfer the Petition was served via electronic ECF filing.

Respectfully submitted,

/s/ Katherine H. Blankenship
Katherine H. Blankenship (FL 1031234)
Sanctuary of the South, PLLC
PO Box 847
Murfreesboro, TN 37130
katie@sanctuaryofthesouth.com
786-671-8133
Attorney for Petitioner