

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

_____)	
ISRRAEL MOLINA ARELLANO,)	
Petitioner,)	
)	
V.)	Case No. 25-cv-878
)	
PAM BONDI, Attorney General of the United States;)	
KRISTI L. NOEM, Secretary, Department of)	
Homeland Security; TODD LYONS, Acting Director,)	
U.S. Immigration and Customs Enforcement; and)	
GREG HALE, Superintendent, Northwest State)	
Correctional Facility - St. Albans; and)	
DAVID W. JOHNSTON,)	
in his official capacity as Vermont Sub-office)	
Director of Immigration and Customs Enforcement.)	
)	
)	
Respondents.)	
_____)	

**NOTICE OF STIPULATION OF DISMISSAL FOR LACK OF JURISDICTION AND
MOTION TO TRANSFER PETITION FOR WRIT OF HABEAS CORPUS AND
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

Comes now, Counsel for the Petitioner, Katherine H. Blankenship, and notes that the Respondents, pursuant to the Court’s Order on November 12, 2025, provided sufficient information by November 14, 2025 reflecting that Petitioner was no longer in the District of Vermont upon the filing of the Petition for Writ of Habeas Corpus (the “Petition”) and Emergency Motion for Temporary Restraining Order (the “TRO Motion”). The Petitioner thus stipulates that jurisdiction is no longer proper in the District of Vermont.

Pursuant to the information provided by Respondent, at the time of filing the Petition and TRO Motion, Petitioner was detained at the Port Isabel Detention Center, which is in the

Southern District of Texas, Brownsville Division. Upon information and belief, Petitioner remains there today.

Therefore, pursuant to 28 U.S.C.S. § 1631, this Court has the authority to transfer this case to the Southern District of Texas. *See Ozturk v. Hyde*, 136 F.4th 382, 391 (2d Cir. 2025) (noting transfer was appropriate for a case in a similar posture). Such a transfer is in the interests of justice, as the basis for Petitioner's Petition and Motion remain unresolved and require judicial intervention. Petitioner, therefore, respectfully requests that this Court transfer the Petition and TRO Motion to the Southern District of Texas, Brownsville Division, and render the current TRO Motion moot for lack of jurisdiction.

Respectfully submitted,

/s/ Katherine H. Blankenship
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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Stipulation of Dismissal for Lack of Jurisdiction and Motion to Transfer Petition for Writ of Habeas Corpus and Emergency Motion for Temporary Restraining Order was served via ECF Pacer with the District of Vermont on November 17, 2025.

/s/ Katherine H. Blankenship
Katherine H. Blankenship