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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

12 BIANCA XIOMARA GASTELUM-
13 LOPEZ,
14 Petitioner,
15 v.
16 Kristi NOEM, in her official capacity as
Secretary of Homeland Security, et al.,
17 Respondents.
18

Case No.: 25-CV-3203-RSH-BLM

JOINT MOTION TO DISMISS

19
20 Petitioner Bianca Xiomara Gastelum-Lopez, by and through her counsel, Murray
21 D. Hilts, and Respondents Kristi Noem, et al., by and through their counsel, Adam
22 Gordon, United States Attorney, and Tom Merritt, Assistant United States Attorney,
23 hereby jointly agree and stipulate to dismissal of this case without prejudice. The parties
24 further agree that each party will bear its own fees and costs of suit.

25 DATED: December 12, 2025

s/ Murray D. Hilts
MURRAY D. HILTS
Attorney for Petitioner

27 DATED: December 12, 2025

ADAM GORDON
United States Attorney

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s/Tom Merritt
TOM MERRITT
Assistant U.S. Attorney
Attorneys for Respondents

SIGNATURE CERTIFICATION

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

DATED: December 12, 2025

s/Tom Merritt
TOM MERRITT
Assistant U.S. Attorney