

1 ADAM GORDON  
United States Attorney  
2 ALYSSA SANDERSON  
Assistant U.S. Attorney  
3 California Bar No. 353398  
Office of the U.S. Attorney  
4 880 Front Street, Room 6293  
San Diego, CA 92101-8893  
5 Telephone: (619) 546-7634  
Facsimile: (619) 546-7751  
6 Email: [alyssa.sanderson@usdoj.gov](mailto:alyssa.sanderson@usdoj.gov)

7 Attorneys for Respondents

8  
9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 SAMIR PAUDEL,

12  
13 Petitioner,

Case No.: 3:25-cv-03174-AGS-BLM

14 v.

**JOINT MOTION TO DISMISS**

15 KRISTI NOEM, *Secretary of the*  
16 *Department of Homeland Security, et al.,*

17  
18 Respondents.

19  
20 Petitioner Samir Paudel, by and through his counsel, Kara Lee Hartzler, and  
21 Respondents Kristi Noem, et al., by and through their counsel, Adam Gordon, United  
22 States Attorney, and Alyssa Sanderson, Assistant United States Attorney, hereby jointly  
23 agree and stipulate to dismissal of this case without prejudice. The parties further agree  
24 that each party will bear its own fees and costs of suit.

25 Respectfully submitted,

26 DATED: December 8, 2025

27 s/ Kara Lee Hartzler  
KARA LEE HARTZLER  
28 Federal Defenders of San Diego, Inc.  
Attorney for Petitioner

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: December 8, 2025

ADAM GORDON  
United States Attorney

s/ Alyssa Sanderson  
ALYSSA SANDERSON  
Assistant United States Attorney  
Attorneys for Respondents

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Petitioner, and that I have obtained her authorization to affix her electronic signature to this document.

DATED: December 8, 2025

s/ Alyssa Sanderson  
ALYSSA SANDERSON  
Assistant United States Attorney