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6
7 **UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

8 I.E.,

9 Petitioner-Plaintiff,

10 v.

11 Jeremy CASEY, Warden, Imperial Regional
Detention Facility;

12 Gregory J. ARCHAMBEAULT, Acting Field
Office Director of San Diego Office of Detention
13 and Removal, U.S. Immigrations and Customs
Enforcement; U.S. Department of Homeland
14 Security;

15 Todd M. LYONS, Acting Director, Immigration
and Customs Enforcement, U.S. Department of
Homeland Security;

16 Kristi NOEM, in her Official Capacity, Secretary,
17 U.S. Department of Homeland Security; and

18 Pamela BONDI, in her Official Capacity, Attorney
General of the United States;

19 Respondents-Defendants.

**Case No. 3:25-cv-03227-DMS-
DDL**

**JOINT MOTION TO DISMISS
WITHOUT PREJUDICE**

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1 On December 2, 2025, the Court granted the Petitioner's Application for a Temporary Restraining
2 Order and ordered for the Respondents to provide the Petitioner with an individualized bond hearing
3 within fourteen days. *See* ECF 9. On December 12, 2025, the Petitioner appeared before an immigration
4 judge, who ordered the Petitioner to be released on bond. *See* ECF 10. Subsequently, the Petitioner posted
5 bond and was released from Department of Homeland Security custody. Accordingly, both parties have
6 agreed to jointly move the Court to dismiss the instant proceeding without prejudice. Each party will bear
its own costs and fees.

7 Respectfully submitted this 19th day of December, 2025.

By counsel,

8 /s/ Warren Craig

9 Warren Craig
Attorney for Petitioner

10 /s/ Betsey Boutelle

11 Betsey Boutelle
Assistant United States Attorney
12 Attorney for Respondents

13 **SIGNATURE CERTIFICATION**

14 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
15 of the United States District Court for the Southern District of California, I hereby certify that the content
16 of this document is acceptable to counsel for Respondents, and that I have obtained counsel's authorization
to affix their electronic signature to this document.

17 DATED: December 19, 2025

18 /s/ Warren Craig

19 Warren Craig
Attorney for Petitioner