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8 *Attorneys for Respondents*

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE DISTRICT OF ARIZONA**

11 Kevin Alexander Polanco Retana,

12  
13 Petitioner,

14 v.

15 Pamela Bondi, et al.,

16 Respondents.

No. 25-cv-04370-KML-JZB

**JOINT STIPULATION OF  
DISMISSAL**

17 **JOINT STIPULATION OF DISMISSAL**

18 This Case comes before the Court on the parties' stipulation. The Petitioner and  
19 Respondents stipulate to the following:

- 20 1. The United States Immigration and Customs Enforcement ("ICE") agrees to  
21 remove Petitioner to Mexico and not to El Salvador.  
22 2. There are currently no plans by ICE to remove Petitioner to El Salvador. ICE  
23 and counsel for Petitioner agree to continue to pursue and facilitate removal  
24 of the Petitioner to Mexico.  
25 3. ICE and counsel for Petitioner agree to work with the Mexican Consulate to  
26 facilitate Petitioner's removal to Mexico.  
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4. Currently, there are no impediments to Petitioner's removal to Mexico but for the Temporary Restraining Order in effect in this matter which enjoins Petitioner's removal from the United States.
5. If the Mexican Consulate agrees to accept Petitioner, ICE agrees to remove Petitioner to Mexico and not to El Salvador.
6. ICE is attempting to locate Petitioner's Mexican permanent resident card and when it does, it will return it to him upon his removal to Mexico.
7. If for some reason Mexico will not accept removal of Petitioner there, ICE will not pursue removal to any other country, including El Salvador, without first moving to reopen Petitioner's removal proceedings and allowing him to assert a claim of fear of return to any other country, including El Salvador.
8. Upon the terms of this stipulation, Petitioner agrees to dismiss this action without prejudice with each side bearing its own costs and fees.

Respectfully submitted this 25th day of November, 2025.

TIMOTHY COURCHINE  
United States Attorney  
District of Arizona

s/ Keli M. Reynolds  
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*Attorney for Petitioner*

s/Theo Nickerson  
THEO NICKERSON  
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