

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

Ricardo AGUAYO-RODRIGUEZ,
Petitioner

v.

Case No.: CIV-25-1418-D

Kristi NOEM, et al.,

Respondents.

STIPULATION OF VOLUNTARY DISMISSAL
PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)

To the Honorable Judge of Said Court:

It is hereby stipulated and agreed by and between Petitioner and Respondents Kristi Noem, in her official capacity as Secretary, U.S. Department of Homeland Security; Pamela Bondi, in her official capacity as U.S. Attorney General; Todd Lyons, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement (ICE); and Sam Olsen, in his official capacity as Field Office Director of Enforcement Operations, ICE Chicago Field Office, Immigration and Customs Enforcement¹ and their respective counsel, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil

¹ Respondent Steve Kelley, Warden of Kay County Detention Facility, is not a federal official and this stipulation is therefore not filed on his behalf. It is respectfully submitted that Warden Kelley's interests in this litigation are contractually derivative of the federal respondents' interests and that a separate submission from Warden Kelley is not necessary.

Procedure, that the above-captioned action is voluntarily dismissed without prejudice, due to the Petitioner receiving a bond hearing, thereby mooting this action. Each party is to bear their own costs, expenses, and fees.

Respectfully submitted,

s/Kelli J. Stump

Kelli J Stump, OBA No. 21374
Attorney for Petitioner
111 NW 15th Street
Oklahoma City, OK 73103
Phone: (405) 217-4550
Email: kelli.stump@stumpimmigration.com

ROBERT J. TROESTER
United States Attorney

s/ AMANDA R. JOHNSON

AMANDA R. JOHNSON, OK Bar No. 32575
Assistant U.S. Attorney
United States Attorney's Office
Western District of Oklahoma
210 Park Avenue, Suite 400
Oklahoma City, OK 73102
(405) 553-8700
Amanda.Johnson3@usdoj.gov
Attorney for Respondents