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

8  
9 **SALVADOR VILLEGAS SANTACRUZ,**

Case No.: **3:25-cv-3419-AGS-SBC**

10  
11 Petitioner

12 v.

13 **Kristi NOEM, et al.,**

14 Respondents.  
15

**JOINT MOTION TO DISMISS**

16  
17 Petitioner Salvador Villegas Santacruz, by and through his counsel, Alejandro Monsalve,  
18 and Respondents Kristi Noem, et al., by and through their counsel, Adam Gordon, United States  
19 Attorney, and Juliet M. Keene, Assistant United States Attorney, hereby jointly agree and  
20 stipulate to dismissal of this case without prejudice. The parties further agree that each party will  
21 bear its own fees and costs of suit.

22 DATED: December 15, 2025

s/Alejandro Monsalve  
ALEJANDRO MONSALVE  
Attorney for Petitioner

23  
24 DATED: December 15, 2025

ADAM GORDON  
United States Attorney  
s/Juliet M. Keen  
JULIET M. KEENE  
Assistant U.S. Attorney  
Attorneys for Respondents

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**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 Juliet M. Keene, counsel for Respondents, and that I have obtained Mrs. Keene's authorization to affix her electronic signature to this document.

DATED: December 15, 2025

*s/Alejandro Monsalve*  
ALEJANDRO MONSALVE  
*Attorney for Petitioner*