



mistake. Counsel for the Government mistakenly relied on the Minute Entry on PACER, rather than the Court's Order, in scheduling the deadline for the Government's response. The Minute Entry contains a scrivener's error, stating that the Government has until January 16, 2026, to file a response.

4. Petitioner was granted voluntary departure on January 5, 2026 and departed from the United States on or about January 7, 2026. As such, the parties jointly move to dismiss this action.

The Petitioner and the Government respectfully request that the Court grant this Motion and dismiss the Petition for a Writ of Habeas Corpus.

Dated: January 14, 2025

Respectfully Submitted,

/s/ Alexander McDonough

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**CERTIFICATE OF SERVICE**

I certify that on January 14, 2026, the foregoing was filed and served through the Court's CM/ECF system.

*s/ Alexander McDonough*  
**Alexander McDonough**  
Special Assistant United States Attorney

**Certificate of Conference**

As required by Rule 7.1(D) of the Local Rules of the District Court of the Southern District of Texas, I certify that I conferred with Petitioner's counsel, Clarrissa Guajardo, about this Joint Stipulation of Dismissal by phone. During that call, Petitioner's counsel indicated she would be willing to join this Motion because Petitioner was granted voluntary departure and departed from the United States.

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Alexander McDonough

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