

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

M.D.B.H.,
Petitioner,

v.

ROBERT F. KENNEDY, *et al.*,
Respondents.

§
§
§
§
§ CIVIL ACTION NO. 1:26-cv-00195
§
§
§
§
§
§
§

STIPULATED MOTION TO DISMISS

The Government and Petitioner hereby jointly move to dismiss this action. Petitioner has been released from the custody of the Office of Refugee Resettlement (“ORR”). Therefore, the parties jointly request that the Court grant this motion and dismiss this matter.

Dated: March 3, 2026

LAUREN FISHER FLORES
Pro Bono Counsel for Petitioner

By: /s/Lauren Fisher Flores

Lauren Fisher Flores
South Texas Pro Bono Asylum
Representation Project (“ProBAR”)
202 S. 1st St., Ste. 300
Harlingen, TX 78550
(956) 365-3775
Lauren.flores@abaprobar.org
State Bar No. 24091635
Southern District of Texas Federal Number:
3948551

By: _____

Alexander McDonough
Special Assistant United
States Attorney
SDTX ID. No. 3948544
Ohio Bar No. 103934
600 E. Harrison, Ste. 201
Brownsville, TX 78520-5106
Telephone: (956) 983-6090
Facsimile: (956) 618-8016
Email: Alexander.McDonough2@usdoj.gov
Attorney for Federal Respondents

CERTIFICATE OF SERVICE

I certify that on March 3, 2026, the foregoing was filed and served through the Court's CM/ECF system.

/s/Lauren Fisher Flores
Lauren Fisher Flores

Reviewed and the Undersigned jointly agree to the filing of this Motion:

/s/Lauren Fisher Flores
Lauren Fisher Flores, Esq.
Pro Bono Attorney for the Petitioner

3/3/2026
Date

Alexander McDonough, SAUSA
Attorney for Federal Respondents

3/3/2026
Date

Certificate of Conference

As required by the local rules, I certify that I conferred with Alexander McDonough, SAUSA, about joining this Motion. Because Petitioner has been released from ORR custody, Respondent's counsel stated that he is amenable to joining a motion to dismiss.

Respectfully submitted,

LAUREN FISHER FLORES
Pro Bono Counsel for Petitioner

By: /s/Lauren Fisher Flores

Lauren Fisher Flores
South Texas Pro Bono Asylum
Representation Project ("ProBAR")
202 S. 1st St., Ste. 300
Harlingen, TX 78550
(956) 365-3775
Lauren.flores@abaprobar.org
State Bar No. 24091635
Southern District of Texas Federal Number:
3948551