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ATTORNEY FOR WASHOE COUNTY
SHERIFF DARIN BALAAM

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BERNABE GODINEZ HERNANDEZ,

Petitioner,

vs.

MARKWAYNE MULLIN, et al.,

Respondents.

Case No. 3:26-cv-00219-ART-CSD

**STIPULATION TO REMOVE
WASHOE COUNTY SHERIFF DARIN
BALAAM AS RESPONDENT**

(ECF No. 1)

Respondent Darin Balaam ("Sheriff Balaam") by and through counsel, as well as
Petitioner Bernabe Godinez Hernandez ("Petitioner") and his respective counsel and
Federal Respondents' respective counsel (hereinafter "Parties"), hereby file this stipulation.
The Parties stipulate and agree as follows:

1. Sheriff Balaam is Sheriff of the Washoe County Sheriff's Office ("WCSO"),
which operates and maintains the Washoe County Jail owned by Washoe County, and
pursuant to a detention services agreement with ICE, Sheriff Balaam had (and has) no
independent involvement in Petitioner's immigration proceedings and no independent
authority to release Petitioner. Sheriff Balaam and the Washoe County Jail are required to
house Petitioner in the Washoe County Jail facility unless and until directed otherwise

2. To the best of the Parties' knowledge and understanding, Petitioner was
transferred by U.S. Immigration and Customs Enforcement ("ICE") on March 27, 2026, to
a separate holding facility pending these proceedings.

3. Petitioner is no longer in the custody of the Washoe County Jail.

4. The Parties agree that Sheriff Balaam has no further involvement in this matter.

5. Accordingly, Petitioner voluntarily dismisses Sheriff Balaam as a Respondent in this matter, and it is agreed by all Parties that Respondent Washoe County Sheriff Darin Balaam is dismissed from the instant action and removed from the instant proceedings as a named Respondent.

Date 04/01/2026

/s/ Karen S. Monrreal
KAREN S. MONRREAL
Law Offices of Karen S. Monrreal
ATTORNEY FOR PETITIONER
BERNABE GODINEZ HERNANDEZ

Date 04/01/2026

/s/ Cobi Burnett
COBI BURNETT
Deputy District Attorney
ATTORNEY FOR WASHOE
COUNTY SHERIFF BALAAM

Date 04/01/2026

TODD BLANCHE
Deputy Attorney General of the United States
SIGAL CHATTAH
First Assistant United States Attorney

/s/ Martin J. Mayer
MARTIN J. MAYER
Special Assistant United States Attorney

ORDER GRANTING STIPULATION

IT IS SO ORDERED.

Dated this ____ day of April, 2026.

U.S. DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, the foregoing was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

KAREN SARAHI MONRREAL-SALAZAR
LAW OFFICE OF KAREN S. MONRREAL

MARTIN MAYER
DOJ-USAO

TAMER BOTROS BOTROS
US ATTORNEY'S OFFICE

Dated this 1st day of April, 2026.

/s/ N. Stapledon
N. Stapledon