

ADAM GORDON
United States Attorney
CAMILLE SAVEDRA
California Bar No. 336490
MICHAEL WALLACE
Maryland Bar No. 9912160256
Assistant U.S. Attorneys
Office of the U.S. Attorney
880 Front Street, Room 6293
San Diego, CA 92101-8893
Telephone: (619) 546-5084/8714
Email: camille.savedra@usdoj.gov
michael.wallace4@usdoj.gov

Attorneys for Respondents

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

PAPE IBRA FALL,
Petitioner,

v.

JEREMY CASEY, Warden, Otay Mesa
Detention Center, *et al.*,
Respondents.

Case No.: 25-cv-2347-DMS-BJW

JOINT MOTION TO DISMISS

Petitioner Pape Ibra Fall ("Petitioner"), by and through his counsel, Kara Hartzler, and Respondents Jeremy Casey, *et al.* ("Respondents"), by and through their counsel, Adam Gordon, United States Attorney, and Camille Savedra and Michael Wallace, Assistant United States Attorneys, hereby jointly agree and stipulate to dismissal of this case without prejudice because Respondents removed Petitioner to the country of Senegal on May 19, 2026.

DATED: May 21, 2026

s/ Kara Hartzler
KARA HARTZLER
Federal Defenders of San Diego, Inc.
Attorneys for Petitioner

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2 DATED: May 21, 2026

ADAM GORDON
United States Attorney

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4 s/ Camille Savedra
CAMILLE SAVEDRA
5 MICHAEL WALLACE
Assistant U.S. Attorneys
6 Attorneys for Respondents
7

8 **SIGNATURE CERTIFICATION**

9 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
10 and Procedures of the United States District Court for the Southern District of
11 California, I hereby certify that the content of this document is acceptable to Kara
12 Hartzler, counsel for Petitioner, and that I have obtained Ms. Hartzler's authorization to
13 affix his electronic signature to this document.

14 DATED: May 21, 2026

15 s/ Camille Savedra
16 CAMILLE SAVEDRA
17 Assistant United States Attorney
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