

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Alfredo Benito Maldonado,
Plaintiff,

v.

Kristi Noem,
Secretary, U.S. Department of
Homeland Security et al.

Defendants.

Cause No. 4:25-cv-02541

PLAINTIFF'S NOTICE OF DISMISSAL

COMES NOW Plaintiff, by and through the undersigned counsel, respectfully file this Notice of Dismissal. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), the Plaintiff hereby moves this court to dismiss, without prejudice, all causes of action in Civil Action No. 4:25-cv-02541. In support thereof, Plaintiff states as follows:

This Notice of Dismissal is filed as a right pursuant to Federal Rule of Civil Procedure 41(a)(1)(A) which provides that "the plaintiff may dismiss an

action without a court order by filing: (i) a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment;...."

None of the Defendants have filed an answer or a motion for summary judgment.

This dismissal of the causes of action is without prejudice, including without prejudice to the re-filing of any of Plaintiff's causes of action against the Defendants

Respectfully submitted,

/s/Javier Rivera

Javier Rivera. Esq.

Lead Counsel for Plaintiffs

Texas Bar No. 24070508

Rivera & Shirhatti, PC

PO Box 848

Houston, Texas 77001

jrivera@rsimmilaw.com

(P): (832) 991-1105

CERTIFICATE OF SERVICE

I, Javier Rivera, hereby certify that a true and correct copy of the foregoing "PLAINTIFF'S NOTICE OF DISMISSAL, including all attachments, was served on all Defendants via the Courts CM/ECF System.

On this the 7th day of August 2025.

Respectfully submitted,

/s/Javier Rivera
Javier Rivera. Esq.
Lead Counsel for Plaintiffs
Texas Bar No. 24070508
Rivera & Shirhatti, PC
PO Box 848
Houston, Texas 770
Jrivera@rsimmilaw.com
(P): (832) 991-1105