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

JULIAN VASQUEZ GARCIA;
NICOLAS JIATAZ PATZAN; and
ALFREDO VASQUEZ,

Petitioners,

v.

KRISTI NOEM; et al.,

Respondents.

Case No.: 25-cv-2180-DMS-MMP

JOINT MOTION TO DISMISS

Petitioners Julian Vasquez Garcia, Nicolas Jiataz Patzan, and Alfredo Vasquez, by and through their counsel, Niels Frenzen and Jean Reisz, and Respondents Kristi Noem, et al., by and through their counsel, Adam Gordon, United States Attorney, and Erin Dimbleby, Assistant United States Attorney, and hereby jointly agree and stipulate to dismissal of this case without prejudice. The parties further agree that each party will bear its own fees and costs of suit.

DATED: September 26, 2025

s/ Niels W. Frenzen
NIELS W. FRENZEN
JEAN E. REISZ
Attorneys for Petitioners

1 DATED: September 26, 2025

2 ADAM GORDON
United States Attorney

3 s/Erin M. Dimbleby
4 ERIN M. DIMBLEBY
Assistant U.S. Attorney
5 Attorneys for Respondents
6

7 **SIGNATURE CERTIFICATION**

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

14 DATED: September 26, 2025

15 s/Erin M. Dimbleby
16 ERIN M. DIMBLEBY
Assistant United States Attorney
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