UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

W.M.R.P. A Minor, *et al.*,	§	
	§	
Petitioners	§	
	§	
v.	§	CASE NO. 2:26-CV-00024
	§	
KRISTI NOEM, *et al.*,	§	
	§	
Respondents	§	

PETITIONERS' RESPONSE TO RESPONDENTS' MOTION TO DISMISS

TO THE HONORABLE JUDGE OF THE COURT:

Petitioners, through undersigned counsel, respectfully submit this response to the Court's Order dated February 18, 2026 and to Respondents' Motion to Dismiss dated January 29, 2026, and state as follows:

Petitioners have reviewed Respondents' motion to dismiss the petition as moot and, in light of W.M.R.P.'s release into the custody of his brother, do not oppose dismissal of the current petition without prejudice.

Petitioners expressly reserve and preserve all rights to:

a. Refile a habeas petition in the future should circumstances change or new grounds arise;

b. Pursue any other remedies available under federal or state law; and

c. Raise any claims not adjudicated on the merits in this proceeding.

Petitioners' agreement to dismissal is made solely for purposes of judicial efficiency and should not be construed as a waiver of any substantive or procedural rights.

WHEREFORE, Petitioners respectfully request that the Court dismiss the petition without prejudice and note on the record that Petitioners' rights are preserved as set forth above.

Dated: February 25, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Alexa L. Sendukas
Alexa L. Sendukas
Attorney for Petitioners