

United States District Court
Western District of Texas
El Paso Division

Dayana Estefania Cajamarca Alomoto,
Petitioner,

v.

No. 3:26-CV-00099-KC

Pamela Bondi, et. al.

Respondents.

**UNOPPOSED MOTION TO DISMISS NEXT OF FRIEND PETITION OF WRIT OF
HABEAS CORPUS**

Federal Respondents now file this unopposed Motion to Dismiss Next of Friend Petition for Writ of Habeas Corpus.

Petitioner has filed two causes of actions with the same basic set of facts in *both* *Cajamarca Alomoto v. Bondi et. al*, 3:26-cv-99-KC, ECF Doc. No. 1 (W.D. Tex. Jan 21, 2026) and *Cajamarca Alomoto v. Bondi et. al*, 3:26-cv-142-KC, ECF Doc. No. 1 (W.D. Tex. Jan. 23, 2026). Counsel for Respondents conferred with Bonnie Smerdon, counsel for Petitioner, to request whether the cases should be consolidated or dismissed. Counsel for Petitioner informed Respondents that they are unopposed to a Motion to Dismiss in this action, *Cajamarca Alomoto v. Bondi et. al*, 3:26-cv-99-KC, ECF Doc. No. 1 (W.D. Tex. Jan 21, 2026). See Ex. A. Accordingly, Respondents' respectfully request this court, to dismiss this case.

WHEREFORE PREMISES CONSIDERED, Federal Respondents respectfully request this Court to Dismiss this case.

Respectfully submitted,

Justin R. Simmons
United States Attorney

/s/ Adrian Acosta

Adrian Acosta
Assistant United States Attorney
Texas No. 24097275
700 E, San Antonio Ave. Ste. 200
El Paso, Texas 79901
(915) 534-6884
Adrian.Acosta@usdoj.gov

Attorneys for Federal Respondents

CERTIFICATE OF CONFERENCE

Federal Respondents' Counsel reached out to Bonnie Smerdon, counsel for Petitioner in *Cajamarca Alomoto v. Bondi et. al*, 3:26-cv-142-KC, ECF Doc. No. 1 (W.D. Tex. Jan. 23, 2026), on January 24, 2026, and Ms. Smerdon, indicated that her client is unopposed to a motion to dismiss in this cause of action.

/s/ Adrian Acosta
Adrian Acosta