

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LILIAN PAHOLA CALDERON JIMENEZ,
and LUIS GORDILLO, *et al.*,

Individually and on behalf of all others
similarly situated,

Plaintiffs-Petitioners,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants-Respondents.

C.A. No. 18-10225-MLW

MOTION TO DISMISS FOLLOWING FINAL SETTLEMENT APPROVAL

Pursuant to Fed. R. Civ. P. 41(a)(2), Petitioners request that this case be dismissed if the Court grants the parties' motion for final approval of the settlement (ECF No 670). The dismissal of claims shall be with prejudice and with each party bearing its own costs, in accordance with the parties' proposed Settlement Agreement, ECF No. 654-1.

Petitioners request that the Court retain jurisdiction to enforce the parties' Settlement Agreement, ECF No. 654-1. *See Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994).

Respondents assent to this motion.

Dated: January 14, 2025

Respectfully submitted,

Counsel for the Petitioners

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LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1, the undersigned certifies that counsel for Petitioners conferred with counsel for Respondents. Respondents assent to the relief requested.

Dated: January 14, 2025

/s/ Kevin S. Prussia

Kevin S. Prussia (BBO # 666813)