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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **EASTERN DIVISION – RIVERSIDE**

17 FAOUR ABDALLAH FRAIHAT, *et al.*,
18 Plaintiffs,
19 v.
20 U.S. IMMIGRATION AND CUSTOMS
21 ENFORCEMENT, *et al.*,
22 Defendants.
23

Case No.: 19-cv-01546-JGB(SHK)
**Joint Stipulation to Dismiss Case
Without Prejudice Pursuant to
Federal Rule of Civil Procedure
41(a)(1)(A)(ii)**

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1 The parties submit the following stipulation in this matter on behalf of:
2 Plaintiffs Faour Abdallah Fraihat; Marco Montoya Amaya; Raul Alcocer
3 Chavez; Jose Segovia Benitez; Hamida Ali; Melvin Murillo Hernandez; Jimmy
4 Sudney; José Baca Hernández; Edilberto García Guerrero; Martin Muñoz; Luis
5 Manuel Rodriguez Delgadillo; Ruben Darío Mencías Soto; Alex Hernandez;
6 Aristoteles Sanchez Martinez; and Sergio Salazar Artaga; Inland Coalition For
7 Immigrant Justice, an Organization; and Al Otro Lado, an Organization; and
8 Defendants U.S. Immigration and Customs Enforcement; U.S. Department
9 of Homeland Security; Kristi Noem, in her official capacity as Secretary, U.S.
10 Department of Homeland Security; Caleb Vitello, in his official capacity as Acting
11 Director, U.S. Immigration and Customs Enforcement; Kenneth Genalo, in his
12 official capacity as Acting Deputy Director, U.S. Immigration and Customs
13 Enforcement; Todd Lyons, in his official capacity as Acting Executive Associate
14 Director, Enforcement and Removal Operations; Monica Burke, in her official
15 capacity as Assistant Director of Custody Management, Enforcement and Removal
16 Operations; Stewart D. Smith, in his official capacity as Assistant Director,
17 Immigration and Customs Enforcement Health Service Corps; and Ralph
18 Ferguson, in his official capacity as Acting Assistant Director of Operations
19 Support, Enforcement and Removal Operations¹ (collectively “Parties”).

20 The Parties above hereby stipulate pursuant to FRCP 41(a)(1)(A)(ii) that the
21 matter be dismissed without prejudice, and request that the Court issue an order
22 dismissing the case in its entirety without prejudice. The Parties further stipulate
23 that each side is to bear its own costs and attorneys’ fees in this matter.
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25 DATED: March 17, 2025
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28 ¹ See Fed. R. Civ. P. 25(d) regarding automatic substitution of Defendants.

1 Respectfully submitted,

2 /s/ Shawna L. Parks

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