

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION

KILMAR ARMANDO ABREGO GARCIA,  
*et al.*,

*Plaintiffs,*

v.

KRISTI NOEM, Secretary of the Department of  
Homeland Security, *et al.*,

*Defendants.*

Case No. 8:25-cv-00951 (PX)

**STIPULATION**

At the July 7, 2025 hearing, Plaintiffs argued that this case was not moot because the voluntary-cessation exception applied and Defendants would engage in the same conduct originally complained of in their Complaint. *See* ECF No. 207 at 13–15; ECF No. 1. To remove any possible doubt that the exception does not apply here, Defendants stipulate and agree to the following:

1. Defendants will not remove Plaintiff Kilmar Armando Abrego Garcia to El Salvador again without first reopening his immigration proceedings and terminating his withholding of removal to El Salvador, *see* 8 C.F.R. § 1208.24(f); and
2. If removing Plaintiff Kilmar Armando Abrego Garcia to a third country, Defendants will follow the procedures for third-country removal set forth in the defendants-appellants' stay application, filed and granted in *United States Department of Homeland Security v. D.V.D.*, No. 24A1153 28–32 (May 27, 2025); *see also id.* at 54a–55a.

Defendants' counsel reached out to Plaintiffs' counsel to inquire whether Plaintiffs would be open to jointly filing a stipulation, but the parties were unable to reach an agreement.

Dated: July 9, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General

/s/ Drew C. Ensign  
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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that on July 9, 2025, I caused to be filed the foregoing document via CM/ECF, which caused a copy to be served on all parties.

/s/ Drew Ensign  
Drew C. Ensign  
Deputy Assistant Attorney General  
Civil Division, Office of Immigration Litigation