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Attorneys for Plaintiffs
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Santa Fe Dreamers Project; and Southern Poverty
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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER, et. al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, et. al.,

Defendants.

Case No. 3:19-cv-02051-IM

**STIPULATION AND JOINT MOTION
TO DISMISS REMAINING
CLAIMS WITHOUT PREJUDICE**

**STIPULATION AND JOINT MOTION TO
DISMISS REMAINING CLAIMS**

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LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for the parties conferred on December 7, 2021, and jointly submit this stipulation and motion to dismiss the remaining claims in this case without prejudice.

STIPULATION AND JOINT MOTION TO DISMISS PROCEEDINGS

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, all parties, by and through their attorneys, respectfully stipulate and jointly move to dismiss the remaining claims before this Court without prejudice, each party to bear their own costs and fees. On November 24, 2021, the Court dismissed Plaintiffs' first and second claims. *See* Dkt. No. 122. The Court also ordered Plaintiffs to brief whether the remaining claims, claims three through six, should be dismissed. Dkt. No. 123. The parties now jointly request that those remaining claims, claims three through six, be dismissed without prejudice. The parties request that the Clerk of Court now close this case.

DATED: December 22, 2021

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2 - STIPULATION AND JOINT MOTION TO DISMISS
REMAINING CLAIMS

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**U.S. DEPARTMENT OF JUSTICE, CIVIL
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3 - STIPULATION AND JOINT MOTION TO DISMISS
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