

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MOHAMMED HOQUE,

Case No. 25-cv-1576 (JWB/DTS)

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PAMELA BONDI, in her official capacity as Attorney General of the United States; PETER BERG, in his official capacity as Saint Paul Field Office Director, United States Immigration and Customs Enforcement; JAMIE HOLT, in her official capacity as the St. Paul Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, United States Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; MARCO RUBIO, in his official capacity as Secretary of State; RYAN SHEA, in his official capacity as Freeborn County Sheriff; and MIKE STASKO, in his official capacity as Freeborn County Jail Administrator,

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

Respondents.

Petitioner Mohammed Hoque, by and through his undersigned counsel, moves the Court under Federal Rule of Civil Procedure 65(b) for a temporary restraining order:

(1) immediately releasing Petitioner from custody; or, in the alternative, (2) enjoining any future transfer of Petitioner out of the District of Minnesota during the pendency of this action. The motion is supported by the accompanying memorandum of law, supporting declarations, arguments of counsel, and all the files, records, and proceedings herein.

Dated: April 21, 2025

s/ Anupama D. Sreekanth

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