

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

ADITYA WAHYU HARSONO,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PAMELA BONDI, in her official capacity as United States; DANIEL HARTOG, in his official capacity as the Kandiyohi County Sheriff; MATTHEW AKERSON, in his official capacity as Kandiyohi County Jail Administrator; PETER BERG, in his official capacity as the St. Paul Field Office Director for U.S. Immigration and Customs Enforcement; JAMIE HOLT, in her official capacity as Homeland Security Investigations St. Paul Special Agent in Charge, U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State,

Respondents.

Case No. 25-cv-1976

**MOTION FOR EX PARTE TEMPORARY
RESTRAINING ORDER AND
EMERGENCY PRELIMINARY
INJUNCTION**

EXPEDITED HANDLING REQUESTED

Pursuant to Fed. R. Civ. P. 65 and Local Rule 7.1(d)(1)(A)-(B), Petitioner Aditya Wahyu Harsono hereby moves this Court for emergency injunctive relief—namely, an *ex parte* temporary restraining order followed by an emergency preliminary injunction—that (1) enjoins Respondents from transferring Mr. Harsono outside the jurisdiction of this District while these proceedings are pending; (2) orders Respondents to release Mr. Harsono on bail pending adjudication; and (3) grants a writ of habeas corpus directing Respondents to immediately release Mr. Harsono from custody. Petitioner requests expedited handling of this motion pursuant to Local Rule 7.1(d)(4)(A).

This motion is based on the memorandum of law, the accompanying declarations and exhibits, and any further evidence and argument to be presented at or before the hearing, and all of the files, records and proceedings herein.

Dated: May 2, 2025

s/ Kshithij Shrinath

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