

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Tou Pao Lee, A 

Petitioner,

v.

PAMELA BONDI,
ATTORNEY GENERAL;
KRISTI NOEM,
SECRETARY OF THE DEPARTMENT OF
HOMELAND SECURITY;
RYAN SHEA,
FREEBORN COUNTY SHERIFF
TODD M. LYONS,
DIRECTOR OF ICE FOR THE WASHINGTON,
D.C. HEADQUARTERS

Respondents

Case No. 0:25-CV-02926-PJS-SGE

PETITIONER'S EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Fed. R. Civ. P. 65, Petitioner Tou Pao Lee moves this Court for a Temporary Restraining Order enjoining respondents from violating his Fifth Amendment right to due process by transferring him to a facility out of Minnesota without first justifying his ongoing detention before a neutral judicial officer. At the current time Mr. Lee is detained at Freeborn County Adult Detention Center. Because of the recent transfers of detainees, Mr. Lee is concerned that Immigration and Customs Enforcement will transfer him out of state. Petitioner, however, has not been informed of the same. If ICE has no intention to transfer him out of state, therefore ICE is not prejudice by this order.

Petitioner Tou Pao Lee further requests that a hearing on this matter be scheduled.

Respectfully submitted,
The Petitioner,
By his Attorney,

s/Patrick J. McKeon
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Date: July 18, 2025

Date July 21, 2025

/s/ Cameron Giebink

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