

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 HEARING REGARDING THE
TEMPORARY RESTRAINING ORDER**

Petitioner requests that this Honorable Court schedule an emergency hearing regarding Petitioner's requested Temporary Restraining Order. As reasons for the same, Petitioner's counsel spoke with AUSA Trevor Brown on July 23, 2025 at approximately 3PM Central Time. The AUSA stated that he is not willing to stipulate to having Petitioner remain within the territorial bounds of Minnesota while the actions at this Honorable Court and the Immigration Court are pending.

WHEREFORE, Petitioner respectfully requests that this Honorable Court hold a hearing regarding the requested Temporary Restraining Order as soon as possible. In the alternative that this Honorable Court order that Petitioner not be removed from the territorial bounds of Minnesota until the next hearing or until the Court has made a ruling on the requested Temporary Restraining Order.

Respectfully submitted,
The Petitioner,
By his Attorney,

s/Patrick J. McKeon
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