

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Roosevelt Bartu, Jr.

Case No.: 25-CV-3198

Petitioner

v.

Pamela Bondi, Attorney General; Kristi Noem, Secretary of Homeland Security; Todd M. Lyons, Acting Director of U.S. Immigration & Customs Enforcement; Marcos Charles, Acting Executive Associate Director for Enforcement and Removal Operations; Peter Berg, Field Office Director for Enforcement and Removal Operations; U.S. Immigration & Customs Enforcement; U.S. Department of Homeland Security; Joel Brott, Sherburne County Sheriff.

Respondents.

**PETITIONER'S EMERGENCY
MOTION FOR TEMPORARY
RESTRAINING ORDER UNDER
FRCP 65(b) AND PRELIMINARY
INJUNCTION UNDER FRCP 65(a)**

**EXPEDITED HANDLING
REQUESTED**

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION WITH EXPEDITED HANDLING**

Mr. Roosevelt Bartu, Jr. ("Petitioner"), pursuant to 28 U.S.C. § 2241, the Fifth Amendment of the United States Constitution, 8 U.S.C. §§ 1101 *et seq.* ("the INA"), 5 U.S.C. §§ 702 *et. seq.* (the "APA"), Rule 65(a)-(b) of the Federal Rules of Civil Procedure, 28 U.S.C. § 1657 with reference to 28 U.S.C. Ch. 153, and 28 U.S.C. § 1651 ("All Writs Act") moves the Court for entry of a Temporary Restraining Order and Preliminary Injunction enjoining Respondents, and all persons acting on Respondents' behalf, from

continuing to infringe on Petitioner's constitutional rights by continuing to detain Petitioner.

Petitioner moves the Court to temporarily enjoin Respondents from attempting to move Petitioner from the State of Minnesota during this petition.

Petitioner moves the Court to order Respondents to provide 72-hour notice of any intended movement of Bartu outside the State of Minnesota pending the adjudication of Bartu's habeas corpus petition.

Petitioner moves the Court to order Respondents to immediately release Petitioner. Alternatively, Petitioner moves the Court requiring Respondents to transport Bartu and house him at Kandiyohi County Jail in Willmar, MN pending the outcome of this petition, and to release Bartu within 3 days of the Court's order if Respondents are unable to house Petitioner at Kandiyohi County Jail.

Petitioner is concurrently filing an accompanying Memorandum of Law that fully sets forth the reasons this Motion must be granted.

The moving party does not intend at this time to present witness testimony at an evidentiary hearing **for purposes of this TRO**, as it is believed this matter can be disposed of most efficiently on the papers. **However, Petitioner does seek an evidentiary hearing after a TRO has issued for the purpose of examining Respondents as to the punitive nature and effect of his detention at Sherburne County Jail.**

WHEREFORE, Petitioner prays that this Court grant his request for a temporary restraining order and preliminary injunction.

DATED: August 10, 2025

Respectfully submitted,

RATKOWSKI LAW PLLC

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