

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

Belsai Dominguez Sanchez,

Petitioner,

v.

Pamela Bondi, Attorney General,

0:25-cv-03682 KMM-ECW

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Sirce Owen, Acting Director for Executive
Office for Immigration Review,

Executive Office for Immigration Review,

Samuel Olson, Director, St. Paul Field Office,
Immigration and Customs Enforcement,

and,

Joel Brott, Sheriff of Sherburne County.

Respondents.

**EMERGENCY MOTION
FOR TEMPORARY
RESTRAINING ORDER**

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

For the reasons set forth in the accompanying memorandum, Petitioner Belsai Dominguez Sanchez hereby moves immediate and emergency basis for a Temporary Restraining Order prohibiting Respondents from moving Petitioner outside of the geographic boundaries of the Federal District of Minnesota for the duration of these proceedings.

Petitioner is a Mexican national who has resided in the United States since around 1990. On August 11, 2025, Respondents took Petitioner into custody in Minnesota and transferred Petitioner to the Sherburne County Jail in Elk River, Minnesota, where he remains.

The decision to detain Petitioner without a bond hearing is wrong as a matter of law as it mischaracterizes the scope of the detention authority at 8 U.S.C. § 1225(b)(2)(A) and fails to recognize that Petitioner can only be detained pursuant to 8 U.S.C. § 1226(a) under the facts of this case.

Petitioner hereby moves as follows:

1. Petitioner seeks a Temporary Restraining Order enjoining Respondents from moving Petitioner outside of the geographic boundaries of the District of Minnesota.
2. Petitioner seeks a Temporary Restraining Order ordering that Respondents to provide him with a bond hearing in accordance with 8 U.S.C. § 1226(a)(2)(A) within 7 days.

WHEREFORE, Plaintiff respectfully requests this Court:

- A. Grant this Temporary Restraining Order; and,
- B. Grant such other and further relief as justice may require.

Respectfully submitted,

/s/ David L. Wilson

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September 17, 2025

Date

/s/ Sierra Paulsen

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