

Cameron Giebink
Wilson Law Group
MN Attorney #0402670
3019 Minnehaha Avenue
Minneapolis, MN 55406
(612) 436-7100 / cgiebink@wilsonlg.com

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

Kauser Mohamoud Yusuf,

Petitioner,

v.

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; John E. Cantú, Director, Pheonix Field Office Immigration and Customs Enforcement & Fred Figueroa, Warden of Eloy Federal Detention Center.

Respondents.

25-cv-03409-PHX-SPL (ASB)

**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**

Ms. Kauser Mohamoud Yusuf (“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 (at such time that Respondents are able to respond) enjoining Respondents, and all persons acting on Respondents’ behalf, from (1) continuing to detain Petitioner; (2) attempting to move Petitioner from the State of Arizona during this petition; and (3) moving Petitioner from the State of Arizona without providing 72-hour advance notice during this petition, Petitioner also moves the Court for an emergency preliminary order (4) requiring Respondents to give Petitioner due process prior to removing her to an allegedly safe third country in the form of a full merits hearing for asylum, withholding of removal, and DCAT before an immigration judge, should such a third country be identified. Petitioner is concurrently filing an accompanying Memorandum of Law that 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, as it is believed this matter can be disposed of most efficiently on the papers filed with the initial petition.

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

DATED: September 22, 2025

Respectfully submitted,

/s/ Cameron Giebink

Cameron Giebink

Wilson Law Group

MN Attorney #0402670

3019 Minnehaha Avenue

Minneapolis, MN 55406

(612) 436-7100 / cgiebink@wilsonlg.com

Attorney for Petitioner