

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

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Omar Jamal,

Case No.: 25-CV-03719

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; Ryan Shea, Freeborn 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**

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

Mr. Omar Jamal ("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, or taking any other related enforcement action against 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 Jamal pending the adjudication of Jamal's habeas corpus petition.

Petitioner moves the Court for an emergency preliminary order requiring Respondents to give Jamal due process prior to removing him to an allegedly safe third country (other than Canada) in the form of a full merits hearing for asylum, withholding of removal, and DCAT before an immigration judge relating to the proposed country of removal with a right to an administrative appeal to the Board of Immigration Appeals.

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, as it is believed this matter can be disposed of most efficiently on the papers.

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

DATED: September 21, 2025

Respectfully submitted,

**RATKOWSKI LAW PLLC**

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