

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

Jose Andres Robles Encalada,

Petitioner,

v.

Pamela Bondi, Attorney General,

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,

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

and,

Ryan Shea,
Sheriff of Freeborn County.

Respondents.

0:25-cv-3946

**EMERGENCY MOTION
FOR TEMPORARY
RESTRAINING ORDER OR
PRELIMINARY
INJUNCTION**

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
OR PRELIMINARY INJUNCTION**

For the reasons set forth in the accompanying memorandum, Petitioner Jose Andres Robles Encalada hereby moves immediate and emergency basis for a Temporary Restraining Order or Preliminary Injunction (at such time as Respondent may be heard) prohibiting Respondents from moving Petitioner outside of the geographic boundaries of the Federal District of Minnesota for the duration of these proceedings.

Petitioner is an Ecuadorian national who has resided in the United States since 2019. On September 30, 2025, Respondents took Petitioner into custody in Minnesota and immediately transferred Petitioner to the Freeborn County Jail in Albert Lea, Minnesota, where he remains.

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 or Preliminary Injunction enjoining Respondents from moving Petitioner outside of the geographic boundaries of the District of Minnesota.
2. Petitioner seeks a Temporary Restraining Order or Preliminary Injunction ordering Respondents to hold a bond hearing in accordance with 8 U.S.C. § 1226(a) to determine Petitioner's ongoing custody within seven days.

WHEREFORE, Plaintiff respectfully requests this Court:

- A. Grant this Temporary Restraining Order or Preliminary injunction; and,

B. Grant such other and further relief as justice may require.

Respectfully submitted,

/s/ David Wilson

Date: 10/14/2025

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Attorney for Petitioner