

RAMIREZ-SMITH LAW
NIKKI R. SMITH, ISB: 9030
NSMITH@NRSDT.COM
NEAL F. DOUGHERTY, CSB: 302612
NDOUGHERTY@NRSDT.COM
TALIA D. BURNETT, CSB: 286318
TBURNETT@NRSDT.COM
JACOB ROURK, ISB: 12585
JROURK@NRSDT.COM
444 W. Iowa Ave.
Nampa, ID 83686
208-461-1883

Attorneys for Petitioner

UNITED STATES DISTRICT COURT
FEDERAL DISTRICT COURT OF IDAHO

ESPARZA IBARRA, Edmundo,

Petitioner,

v.

Jason KNIGHT, Field Office Director of Enforcement and Removal Operations, Salt Lake City Field Office, Immigration and Customs Enforcement; Kenneth PORTER, Acting Director of the Boise U.S. Immigration and Customs Enforcement Field Sub-Office; Kristi NOEM, Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, U.S. Attorney General; Executive Office of Immigration Review,

Respondents.

Case No. 1:25-cv-00597-DCN

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

Petitioner moves this Court for a Temporary Restraining Order barring respondents from

transferring the Petitioner outside of the State of Idaho, from taking actions to remove the Petitioner from the United States, and from speaking to the Petitioner regarding his rights in removal proceedings or in this action, absent the presence of his counsel.

DATED this 26th day of October 2025.

Respectfully submitted,

s/Jacob C. Rourk

Jacob C. Rourk

Ramirez-Smith Law

Attorneys for Petitioner