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UNITED STATES DISTRICT COURT
FEDERAL DISTRICT COURT OF IDAHO

VILLAFANA RODRIGUEZ, Adela

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-00600-DKG

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

Petitioner moves this Court for a Temporary Restraining Order barring respondents from removing the petitioner from the District of Idaho; prohibiting Respondents from communicating with Petitioner concerning his rights, responsibilities, or possible outcomes of any proceeding regarding his removal from the United States or these proceedings, absent the presence of counsel; ordering his immediate release from custody; and barring Respondents from taking any further action to effect his removal from the United States, so as to maintain the status quo.

DATED this 26th day of October, 2025.

/s/ Nikki Ramirez-Smith
Nikki Ramirez-Smith
Attorney for Petitioner