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Attorneys for Petitioner

UNITED STATES DISTRICT COURT
FEDERAL DISTRICT COURT OF IDAHO

ORTIZ GONZALEZ, Joaquin

Petitioner,

v.

Jarrodd Thompson, Director of the Mini-Cassia
Criminal Justice Center;

Kenneth Porter, Director of Boise U.S.
Immigration and Customs Enforcement Field
Sub-Office;

Jason Knight, Director of the Salt Lake City U.S.
Immigration and Customs Enforcement Field
Office;

Kristi Noem, Secretary of the U.S. Department of
Homeland Security; and

Pam Bondi, Attorney General of the United
States,

In their official capacities,

Respondents.

Case No. 1:25-cv-00602-AKB

**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