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UNITED STATES DISTRICT COURT  
FEDERAL DISTRICT COURT OF IDAHO

**Jimenez Rangel, Jose Lorenzo**

Petitioner,

v.

**Steve Anderson**, Sheriff of Jeferson County;  
**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-00607-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 26<sup>th</sup> day of October, 2025.

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