

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

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Jose Mario R.S.,

Case No. 25-CV-4296-JRT-JFD

Petitioner,

**PETITIONER'S EMERGENCY  
MOTION FOR TEMPORARY  
RESTRAINING ORDER UNDER  
FRCP 65(b) AND PRELIMINARY  
INJUNCTION UNDER FRCP 65(a)**

v.

Pamela Bondi, Attorney General, et al.,

Respondents.

**EXPEDITED HANDLING  
REQUESTED**

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**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION WITH  
EXPEDITED HANDLING**

Mr. R. S. ("Petitioner"), pursuant to 28 U.S.C. § 2241, the Fifth Amendment of the United States Constitution, 8 U.S.C. §§ 1101 et seq. ("the INA"), 5 U.S.C. §§ et seq. (the "APA"), Rule 65(a)-(b) of the Federal Rules of Civil Procedure, 28 U.S.C. § 1657 with reference to 28 U.S.C. Ch. 153, and 28 U.S.C. § 1651 ("All Writs Act") moves the Court for entry of a Temporary Restraining Order and Preliminary Injunction enjoining Respondents, and all persons acting on Respondents' behalf, from continuing to infringe on Petitioner's constitutional rights by continuing to detain Petitioner.

Petitioner is concurrently filing an accompanying Memorandum of Law that fully sets forth the reasons this Motion must be granted.

The moving party does not intend at this time to present witness testimony at an evidentiary hearing, as it is believed this matter can be disposed of most efficiently on the papers.

WHEREFORE, Petitioner prays that this Court grant his request for a temporary restraining order and preliminary injunction.

DATED: November 18, 2025

Respectfully submitted,

MARTIN LAW, LLC

*/s/Maria Miller*

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