

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

Victor Vazquez Avilez,

Petitioner,

v.

Pamela Bondi, Attorney General,

Case No. 0:25-cv-04480

Kristi Noem, Secretary, U.S. Department of  
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of  
Immigration and Customs Enforcement,

Immigration and Customs Enforcement, and

David Easterwood, Acting Director, St. Paul  
Field Office Immigration and Customs  
Enforcement, and

Ryan Shea, Sheriff of Freeborn County.

Respondents.

**EMERGENCY MOTION  
FOR TEMPORARY  
RESTRAINING ORDER OR  
PRELIMINARY  
INJUNCTION**

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER  
OR PRELIMINARY INJUNCTION**

For the reasons set forth in the accompanying memorandum, Petitioner Victor Vazquez Avilez hereby moves immediate and emergency basis for a Temporary Restraining Order or Preliminary Injunction (at such time as Respondent may be heard) prohibiting Respondents from moving Petitioner outside of the geographic boundaries of the Federal District of Minnesota for the duration of these proceedings.

Petitioner is a Mexican national who has resided in the United States since 2003. On or about October 21, 2025, Respondents took Petitioner into custody in Minnesota and immediately transferred Petitioner to the Freeborn County Jail in Albert Lea, Minnesota, where he remains.

Petitioner can only be detained pursuant to 8 U.S.C. § 1226(a) under the facts of this case.

Petitioner hereby moves as follows:

1. Petitioner seeks a Temporary Restraining Order or Preliminary Injunction enjoining Respondents from moving Petitioner outside of the geographic boundaries of the District of Minnesota.
2. Petitioner seeks a Temporary Restraining Order or Preliminary Injunction ordering Respondents to hold a bond hearing in accordance with 8 U.S.C. § 1226(a) to determine Petitioner's ongoing custody within seven days.

WHEREFORE, Plaintiff respectfully requests this Court:

- A. Grant this Temporary Restraining Order or Preliminary injunction; and,

B. Grant such other and further relief as justice may require.

Respectfully submitted,

/s/ Katherine L. Santamaria El Bayoumi

Date: December 2, 2025

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***Attorney for Petitioner***