

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

Xuseen Afey,

Petitioner,

v.

Pamela Bondi, Attorney General,

**25-cv-04514 (JWB/EMB)**

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

**EMERGENCY MOTION  
FOR TEMPORARY  
RESTRAINING ORDER**

Department of Homeland Security,

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

Immigration and Customs Enforcement,

Daren K. Margolin, Director for Executive  
Office for Immigration Review,

Executive Office for Immigration Review,

And,

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

Respondents.

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

For the reasons set forth in the accompanying memorandum, Petitioner Xuseen Afey hereby moves immediate and emergency basis for a Temporary Restraining Order under Rule 65(b) 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 Somali national who has resided in the United States since 2023. On or about December 3, 2025, Respondents took Petitioner into custody in Minnesota, where he remains.

Petitioner hereby moves as follows:

1. Petitioner seeks a Temporary Restraining Order enjoining Respondents from moving Petitioner outside of the geographic boundaries of the District of Minnesota.
2. Petitioner seeks a Temporary Restraining Order ordering Respondents to release Petitioner immediately in accordance with 8 U.S.C. § 1254a(a)(4)(B) and 8 U.S.C. § 1254a(d)(4).
3. Petitioner seeks a Temporary Restraining Order 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; and,
- B. Grant such other and further relief as justice may require.

Respectfully submitted,

/s/ David L. Wilson

Date: December 4, 2025

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