

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

Mohamed Arte,

Petitioner,

v.

Pamela Bondi, Attorney General,

0:25-cv-04515-MJD-ECW

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 hereby moves immediate and emergency basis for a Temporary Restraining Order pursuant to Rule 65(a) 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 June 30, 2024. On or about December 3, 2025, Respondents took Petitioner into custody in Minnesota and immediately transferred Petitioner to a law enforcement detention facility within Minnesota, where he remains. Respondents, however, may move Petitioner out of this district without notice.

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 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 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.

DATED: December 5, 2025

Respectfully submitted,

/s/ David Wilson

David Wilson

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