

Kira Kelley
CLIMATE DEFENSE PROJECT
P.O. Box 7040
Minneapolis, MN 55407
kira@climatedefenseproject.org
T: (802) 683-4086

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

Edison Vera Bermeo,

Petitioner,

Case No. 25-4601

v.

Pamela Bondi, Attorney General,

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

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

Samuel Olson, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement, and

Ryan Shea, Sheriff of Freeborn County.

Respondents.

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

Expedited Handling Requested

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and the reasons set forth in the accompanying memorandum of law, Petitioner Edison Vera Bermeo respectfully moves this Court on an immediate and emergency basis for an Emergency Temporary Restraining Order and Preliminary Injunction prohibiting Respondents from moving Petitioner outside of the geographic boundaries of the Federal District of Minnesota for the duration of these proceedings, and ordering his release during the pendency of this action.

PRAYER FOR RELIEF

WHEREFORE, Mr. Vera Bermeo prays that this Court grant the following relief;

- (1) Enjoin Respondents from moving Mr. Vera Bermeo out of the District of Minnesota;
- (2) Order that Mr. Vera Bermeo be released during the pendency of these proceedings; and
- (3) Grant any other and further relief that this Court may deem just and proper.

Date: Dec. 11, 2025

/s/ Kira A. Kelley

Kira A. Kelley, Esq.
P.O. Box 7040
Minneapolis, MN 55407
MN Bar ID: 402932
kira@climatedefenseproject.org
(802) 683-4086