

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

Edgar Geovanny Chicaiza Dutan,

Willian Patricio Toalombo Yanchaliquin,

Petitioners,

v.

0:25-cv-04640-ECT-JFD

Pamela Bondi, Attorney General,

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,

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

Executive Office for Immigration Review,

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**

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

For the reasons set forth in the accompanying memorandum, Petitioners hereby move on an immediate and emergency basis for a Temporary Restraining Order pursuant to Rule 65(a) prohibiting Respondents from moving Petitioners outside of the geographic boundaries of the Federal District of Minnesota for the duration of these proceedings.

Petitioner Chicaiza Dutan is an Ecuadorian national who has resided in the United States since around February 2019. Petitioner Toalombo Yanchaliquin is an Ecuadorian national who has resided in the United States since around June 2023. On December 13, 2025, Respondents took Petitioners into custody in Minnesota, where they remain. Respondents, however, may move Petitioners out of this district without notice. **Petitioners have reason to believe Respondents plan to move Petitioner Toalombo Yanchaliquin to Nebraska.**

Petitioners hereby move as follows:

1. Petitioners seek a Temporary Restraining Order enjoining Respondents from moving Petitioners outside of the geographic boundaries of the District of Minnesota.

WHEREFORE, Petitioners respectfully request this Court:

- A. Grant this Temporary Restraining Order; and,
- B. Grant such other and further relief as justice may require.

DATED: December 16, 2025

Respectfully submitted,

/s/ David Wilson

David Wilson

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Attorneys for Petitioners