

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

Willian Patricio Toalombo Yanchaliquin,

Petitioner,

v.

Pamela Bondi, Attorney General,

0:25-cv-04657-NEB-DJF

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,

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

For the reasons set forth in the accompanying memorandum, Petitioner hereby moves on an immediate and emergency basis for a Temporary Restraining Order pursuant to Rule 65(a).

Petitioner Toalombo Yanchaliquin is an Ecuadorian national who has resided in the United States since around June 2023. On December 13, 2025, Respondents took Petitioner into custody in Minnesota.

Petitioner hereby moves as follows:

1. Petitioners seek a Temporary Restraining Order.

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 17, 2025

Respectfully submitted,

/s/ David Wilson

David Wilson

MN Attorney Lic. No. 0280239

Wilson Law Group

3019 Minnehaha Avenue

Minneapolis, MN 55406

(612) 436-7100 / dwilson@wilsonlg.com

/s/ Gabriela Anderson

Gabriela Anderson

MN Attorney Lic. No. 0504395

Wilson Law Group

3019 Minnehaha Avenue

Minneapolis, MN 55406

(612) 436-7100 / ganderson@wilsonlg.com

/s/ Lee Anne Koller Mills

Lee Anne Koller Mills

MN Attorney Lic. No. 0402913

Wilson Law Group

3019 Minnehaha Avenue

Minneapolis, MN 55406

(612) 436-7100 / lmills@wilsonlg.com

Attorneys for Petitioners