

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

Victor Enriquez Romero,

Petitioner,

v.

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,

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

and,

Eric Klang, Sheriff of Crow Wing County.

Respondents.

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

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

For the reasons set forth in the accompanying memorandum, Petitioner Victor Enriquez Romero hereby moves immediate and emergency basis for a Temporary Restraining Order or Preliminary Injunction (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 Mexican national who has resided in the United States since 2005. December 13, 2025, Respondents took Petitioner into custody in Minnesota and immediately transferred Petitioner to the Crow Wing County Jail in Brainerd, Minnesota, where he remains.

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 or Preliminary Injunction enjoining Respondents from moving Petitioner outside of the geographic boundaries of the District of Minnesota.
2. Petitioner seeks a Temporary Restraining Order or Preliminary Injunction 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 or Preliminary injunction; and,

B. Grant such other and further relief as justice may require.

Respectfully submitted,

/s/ Katherine L. Santamaria El Bayoumi

Date: 12/16/2025

Katherine L. Santamaria El Bayoumi

MN Attorney Lic. No. 0504785

Wilson Law Group

3019 Minnehaha Avenue

Minneapolis, MN

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

Attorney for Petitioner