


Luca Lopes Fagundes  
Fagundes Law  
214 N Webster Ave  
Green Bay, WI 54301  
920-421-4700  
LF@fagundeslaw.com

Counsel for petitioner.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

LAVV,	)	Case No. 1:25-CV-02004
	)	
Petitioner,	)	Agency No: 
	)	
vs.	)	<b>MOTION FOR TEMPORARY</b>
	)	<b>RESTRAINING ORDER AND</b>
SAMUEL OLSON, Field Office Director of	)	<b>SUPPORTING MEMORANDUM</b>
Enforcement and Removal Operations, Chicago	)	
Field Office, Immigration and Customs	)	ORAL ARGUMENT
Enforcement , et al.	)	REQUESTED
	)	
Respondents.	)	Expedited hearing requested

MOTION FOR DEFAULT JUDGMENT

Petitioner moves the court to enter an Order for DEFAULT judgment and an Order for the immediate release of the petitioner.

The Court Terminated all Respondents from this action with the exception of Sheriff Dale J. Schmidt. The Court entered an Order on 12/22/2025 requiring that the Respondent show cause as to why the writ for Habeas Corpus should not be issued. The Court provided a 7-day deadline for the show cause to be submitted by the sole

Respondent. That deadline came and passed on 12/29/2025. To date, the sole Respondent has not complied with the Court's Order dated 12/22/2025. As a result, Petitioner respectfully requests that this Court find for the Petitioner by Default. Additionally, the Petitioner requests that this Court enter an Order for the Respondent's release immediately.

Dated this 7<sup>th</sup> day of January, 2026

/s/ Luca L Fagundes

WI #1078070  
Attorney for petitioner