

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

YEFERSON GONZALEZ CONTRERAS

*Petitioner,*

v.

**Samuel L. OLSON**, Field Office Director of Enforcement and Removal Operations, St. Paul Field Office, Immigration and Customs Enforcement; **Kristi NOEM**, in her official capacity as Secretary of the U.S. Department of Homeland Security; **Todd LYONS**, in his official capacity as acting director of U.S. Immigration and Customs Enforcement; **Pam Bondi**, in her official capacity as Attorney General of the United States; **Joel BROTT**, Sherburne County Jail Sheriff.

*Respondents.*

Case No. 0:25-cv-4814

**PETITIONER'S EMERGENCY  
MOTION FOR TEMPORARY  
RESTRAINING ORDER UNDER  
FRCP 65(b) AND PRELIMINARY  
INJUNCTION UNDER FRCP 65  
(a)**

**EXPEDITED HANDLING  
REQUESTED**

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION WITH EXPEDITED HANDLING**

Mr. Gonzalez Contreras ("Petitioner"), pursuant to 28 U.S.C. § 2241, the Fifth Amendment of the United States Constitution, 8 U.S.C. §§ 1101 et seq. ("the INA"), 5 U.S.C. §§ 701 et seq. (the "APA"), and Rule 65(a) and (b) of the Federal Rules of Civil Procedure, moves the Court for entry of a Temporary Restraining Order and Preliminary Injunction enjoining Respondent from continuing to detain Petitioner without recourse during his immigration proceedings. The moving party does not currently intend to present witness testimony at an evidentiary hearing.

The reasons in support of this Motion are set forth in the accompanying Memorandum of Points and Authorities. As set forth in the Points and Authorities in support of this Motion,

Petitioner asserts that he warrants an emergency temporary restraining order due to his weighty liberty interests under the Due Process Clause of the Fifth Amendment in remedying his unlawful detention.

WHEREFORE, Petitioner prays that this Court grant his request for a temporary restraining order enjoining Respondents from continuing to detain Petitioner pending these proceedings or removing Petitioner from the United States pending these proceedings. The only mechanism to ensure that Petitioner does not continue to be unlawfully detained, transferred, or removed in further violation of his due process rights is an ex-parte temporary restraining order from this Court.

DATED this 30<sup>th</sup> day of December 2025.

/s/Gloria Contreras Edin  
Gloria Contreras Edin (SBN 0353255)  
Contreras Edin Law, PA  
663 University Ave. West 200  
St. Paul, MN 55104  
(651) 771-0019  
Gloria@contrerasedinlaw.com  
*Attorney for Petitioner*