

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

BETTY YADIRA CONTENTO ANDRADE,

Petitioner,

v.

PETER BERG, in his official capacity as the St. Paul Field Office Director for U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security, and PAMELA BONDI, Attorney General of the United States,

Respondents.

Case No. 0:26-cv-00075

**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 OR PRELIMINARY INJUNCTION WITH  
EXPEDITED HANDLING**

Petitioner, Betty Yadira Contento Andrade, ("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 Respondents, and all persons acting on Respondents' behalf, from continuing to infringe on Petitioner's constitutional rights by subjecting her to detention, or taking any other related enforcement action against Petitioner, including

transferring Petitioner away from the jurisdiction of this District pending these proceedings and continuing to detain Petitioner during the pendency of her underlying Petition for Writ of Habeas Corpus proceedings. The moving party does not intend at this time 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. This Motion is based on the previously-filed Petition for Writ of Habeas Corpus (Doc. No. 1). As set forth in the Points and Authorities in support of this Motion, Petitioner raises that she warrants an emergency temporary restraining order due to her weighty liberty interests under the Due Process Clause of the Fifth Amendment in remedying her unlawful detention.

WHEREFORE, Petitioner prays that this Court grant her request for a temporary restraining order enjoining Respondents from continuing to detain Petitioner pending these proceedings, and 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 her due process rights is an ex-parte temporary restraining order from this Court.

Respectfully submitted,

Dated: January 7, 2026

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