

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

Oscar O.T.,

Petitioner,

v.

Pamela Bondi, Attorney
General, U.S. Department of Justice,

Kristi Noem, Secretary, U.S.
Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs
Enforcement, and

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

Respondents.

Case No. 26-CV-167 (JWB/JFD)

MOTION FOR CONTEMPT

INTRODUCTION

Petitioner moves the Court for an order holding Respondents in civil contempt for their failure to comply with the Court's January 15, 2026 Order, which required Respondents to immediately release Petitioner from custody and release him in Minnesota. (ECF 6.) In support of this Motion, Petitioner submits a Memorandum of Law, the Affidavits of Mayra Janeth Chasi Chiluisa and Kimberly Boche and exhibits, and a Meet and Confer Statement. Petitioner further requests that the Court order Respondents to

produce with Petitioner, in coordination with the U.S. Marshal Service, before this Court by 9:00 a.m. CST on January 22, 2026.

Dated: January 21, 2026

Respectfully submitted,

/s/Kira Kelley

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