

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

ESTEFANY JOHANNA SANCHEZ,

Petitioner,

v.

Pamela Bondi, Attorney General,

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

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

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

Respondents.

Case No. 0:26-cv-00216

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

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1. Petitioner Estefany Johanna Sanchez (“Ms. Sanchez”), by and through the undersigned attorney, hereby moves this Honorable Court, for entry of a Temporary Restraining Order (“TRO”) pursuant to Federal Rule of Civil Procedure 65(b), or, in the alternative, a preliminary injunction pursuant to Rule 65(a), enjoining Respondents from moving Petitioner out of the jurisdiction of this Court or in the alternative ordering that Petitioner be released pending the outcome of this proceeding.

2. As the accompanying Memorandum and affidavit outline in detail, Petitioner has satisfied the four-part test and bring a matter to this Honorable Court warranting preliminary injunctive relief:
 - a. Petitioner is likely to prevail on the merits of her habeas corpus petition.
 - b. Petitioner is suffering irreparable harm in the form of unconstitutional confinement, which harm is exacerbated by an underlying illness for which treatment is not being provided while in detention.
 - c. Granting the requested relief will not result in any foreseeable, serious harm to Respondents or the public.
 - d. Granting the requested relief is in the public interest.

WHEREFORE, Petitioner respectfully requests that this Court issue a Temporary Restraining Order.

Respectfully submitted,

Date: January 13, 2026

/s/ Kira A Kelley
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