

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

Jorge Isaac Boada Cando,

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-00260

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

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1. Petitioner Jorge Isaac Boada Cando (“Mr. Boada Cando”), 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) 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 brings a matter to this Honorable Court warranting preliminary injunctive relief.

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

Respectfully submitted,

Date: January 14, 2026

/s/ Kira A Kelley

KIRA A. KELLEY

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