

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

---

JESUS ALBERTO PEREZ,

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-00261

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

- 
1. Petitioner Jesus Alberto Perez (“Mr. Perez”), 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

Climate Defense Project

MN Bar No. 0402932

P.O. Box 7040

Minneapolis, MN 55407

(802) 683-4086

[kira@climatedefenseproject.org](mailto:kira@climatedefenseproject.org)

*Attorney for Petitioner*