

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

U.H.A., K.A, H.D., D. Doe, M. Doe, on behalf of themselves and others similarly situated, *and* **THE ADVOCATES FOR HUMAN RIGHTS**,

Plaintiff-Petitioner and Plaintiffs,

v.

PAMELA BONDI, in her official capacity as Attorney General of the United States;
KRISTI NOEM, in her capacity as Secretary of the United States Department of Homeland Security;
TODD M. LYONS, in his official capacity as Acting Director of the United States Immigration and Customs Enforcement;
DAVID EASTERWOOD in his official capacity as Acting Director, St. Paul Field Office, U.S. Immigration and Customs Enforcement; *and*
JOSEPH B. EDLOW, in his official capacity as Director, U.S. Citizenship and Immigration Services,

Defendants-Respondents.

Case No. 0:26-cv-417-JRT-DLM

**MOTION FOR ENTRY OF
PRELIMINARY PROTECTIVE
ORDER**

Plaintiff-Petitioner U.H.A. and Plaintiffs K.A, H.D., D. Doe, M. Doe and The Advocates for Human Rights (together with Plaintiff-Petitioner, “Plaintiffs”), by and through undersigned counsel, respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c) and the Court’s inherent authority to manage its proceedings and protect litigants and witnesses from harm, for entry of a Preliminary Protective Order (“Order”). This Order is necessary to protect Plaintiffs and individuals who may provide

testimony or information in support of Plaintiffs' claims from retaliation or adverse immigration-related consequences before a standard protective order can be negotiated and entered.

Plaintiffs thus respectfully request that this Court grant this Motion and enter the accompanying Proposed Preliminary Protective Order.

Dated: January 24, 2026

/s/ E. Michelle Drake

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