

**UNITED STATES DISTRICT COURT  
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 their 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-00417-JRT-DLM

**PETITIONER'S MOTION FOR  
RELIEF FROM LOCAL RULE 7.1'S  
WORD COUNT LIMITATIONS**

Pursuant to Local Rule 7.1(f) Petitioner Plaintiffs hereby request relief from the word count limitations imposed by the Rule. Petitioners' supplemental memorandum of law pertains to several pending memoranda before the Court, including ECF 11, 13, 15 and 16 may cause Petitioners to exceed the allotted word count as to those Motions. Petitioners ask the Court to find there is good cause to exceed these limitations as the Supplemental Memorandum pertains to facts that post-date the filing of Petitioners' initial memoranda.

Dated: January 25, 2026

Respectfully submitted,

/s/ E. Michelle Drake

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*\* Pro hac vice applications forthcoming*

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