

**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

**DEFENDANTS' MOTION TO
DISSOLVE THE TEMPORARY
RESTRAINING ORDER**

Defendants Pamela Bondi, Kristi Noem, Todd M. Lyons, David Easterwood, and Joseph B. Edlow (collectively Defendants) hereby move the Court pursuant to Federal Rule of Civil Procedure 65(b)(4) to dissolve the Temporary Restraining Order issued on January 28, 2026 and extended on January 29, 2026 (ECF Nos. 41, 49). In the alternative, Defendants move the Court to stay the Temporary Restraining Order pending appeal.

The grounds for this Motion are set forth in the accompanying Memorandum of Law.

Dated: January 31, 2026

DAN N. ROSEN
United States Attorney

Respectfully Submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

DREW C. ENSIGN
Deputy Assistant Attorney General

/s/ Brantley T. Mayers
BRANTLEY T. MAYERS (FL #1039996)
Counsel to the Assistant Attorney General

CATHERINE M. RENO
Acting Assistant Director
United States Department of Justice
Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Telephone: (202) 353-8557
Fax: (202) 305-7000
Email: catherine.m.reno@usdoj.gov