

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

M.S.V.I., a minor child, by and through his
parent and next friend J.M.V.M.,

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,
and

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 0:26-cv-00419

**EMERGENCY
MOTION FOR ORDER
TO SHOW CAUSE**

Petitioner filed a Verified Petition for Writ of Habeas Corpus and in this case on January 18, 2026, *see* ECF 1, as well as a motion to show cause seeking, *inter alia*, that Respondents immediately disclose to counsel Petitioner's location and promptly facilitate his communication with counsel and his family, including his parent and next friend J.M.V.M., *see* ECF 4. The next day, this Court issued an order directing Respondents to do so.

Since the issuance of this Court's order, counsel has made numerous attempts seeking Respondents' compliance with this Court's order. Glenn Decl. To date, they have been unsuccessful. *Id.*

Not until the close of business on January 20, 2026, did Julie T. Le of the Office of the Principal Legal Advisor to ICE contact undersigned counsel claiming that she had "done some research, and it does not appear that this Petitioner is in ICE custody." *Id.* It is unclear what "research" she possibly could have done, however, considering it was subsequently revealed that the United States Attorney's Office had failed to previously provide any identifying information about Petitioner to Respondents in order to facilitate compliance with this Court's order. *Id.* Instead, it appears Respondents are now attempting to cover for the fact that they have failed to comply with this Court's order and lost the minor child they detained.

In the meantime, Petitioner's parent and next friend has been contacted by an individual who claims to have custody of Petitioner. *Id.* This person claims to be a social worker in Michigan and has repeatedly refused to identify himself, provide any details regarding Petitioner's confinement, or facilitate communications between Petitioner and his family. *Id.* Further troubling, this person has attempted to pressure Petitioner's parent to delegate parental authority to this alleged social worker, claiming that he wants to transfer Petitioner to a group home. *Id.* Undersigned counsel attempted to call this alleged social worker during business hours; no one answered the phone and the user has not set up voicemail. *Id.*

Accordingly, Petitioner respectfully moves this Court for an emergency order directing Respondents to show cause whether they are in contempt of this Court's order, whether they effectively lost Petitioner in their haste to wantonly detain immigrants, and any further relief this Court deems appropriate to urgently facilitate efforts to locate Petitioner and ensure his safety and preservation of legal rights. Petitioner reserves the right to request further relief if Respondents are indeed in contempt of this Court's prior order.

Respectfully submitted,

Date: January 21, 2026

_____/s//Claire Nicole Glenn_____

Claire Nicole Glenn (she/her)

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