


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

J.B.C.O., J.E.C.M., minor child  I.,  
A.J.H.G., A.D.B.A., and S.V.M.S., by and  
through next friend E.K.M.P.,

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-424

**RENEWED EMERGENCY  
MOTION FOR ORDER  
TO SHOW CAUSE**

This Court issued an Order granting the Petition for Writ of Habeas Corpus in this case on January 19, 2026, at approximately 6:40 P.M. ECF 9. The Order directed Respondents to “release Petitioners from custody as soon as practicable, and no later than 72 hours within the filing of this order,” and “immediately return Petitioners to Minnesota, prior to their release.” ECF 9 at 2.


The parties also appeared for a status conference regarding Petitioners’ first motion for an order to show cause on January 21, 2026, and this deadline was affirmed

by the Court. Petitioners incorporate by reference here their first motion for an order to show cause, ECF 10, as well as the arguments made by their counsel at that hearing.


At that hearing, Respondents' counsel asserted for the first time that he had never been provided a copy of the Petition, which had been filed January 18, 2026.

Immediately following the hearing, undersigned counsel emailed him a copy of the petition and the sealed notice of petitioners' identities, which had been previously provided to Ana Voss and several other attorneys in his office the morning of January 19, 2026, as well as the additional filings referenced by counsel in her arguments.

The deadline by which this Court ordered Respondents to return Petitioners to the District of Minnesota and release them expired on January 22, 2026, at approximately 6:39 P.M.

On January 22, 2026, at approximately 9:30 P.M., undersigned counsel checked ICE's online detainee locator. It indicated that J.B.C.O. remained incarcerated in Dilley, Texas, presumably with his minor child , and all other Petitioners remained incarcerated at ERO El Paso, also in Texas. Undersigned counsel promptly emailed Respondents' counsel on behalf of her clients, noted the issue and asked that he please advise, and indicated that if she did not hear anything from him by the next morning, she would renew the Petitioners' motion for sanctions. As of this filing, Respondents' counsel has not responded to Petitioners' request.

At approximately 8:30 P.M. on January 23, 2026, undersigned counsel again checked the ICE online detainee locator, and it again indicated that J.B.C.O. remained

incarcerated in Dilley, Texas, presumably with his minor child , and all other  
Petitioners remained incarcerated at ERO El Paso, also in Texas.

Accordingly, Petitioners renew their emergency motion for an order show cause why Respondents should not be held in contempt of court. Petitioners specifically ask that this Court to direct Respondents to produce affidavits or exhibits identifying with particularity when, how, and from and to whom this Court's orders in this case have been communicated, and why Respondents have failed to comply with them to date. Petitioners request any further relief this Court may deem just and proper to ensure their immediate release from what is becoming increasingly oppressive unlawful imprisonment. Petitioners reserve the right to request any and all appropriate sanctions once the factual record is developed as to the scope and magnitude of contempt.

Respectfully submitted,

Date: January 23, 2026

          //s//Claire Nicole Glenn            
**Claire Nicole Glenn (she/her)**  
Staff Attorney  
Climate Defense Project  
P.O. Box 7040  
Minneapolis, MN 55407  
651-343-4816  
claire@climatedefenseproject.org  
~ ~ ~  
District of Columbia License No. 888242412  
Maryland License No. 1902280002  
Minnesota License No. 0402443

*Attorney for Petitioner*