

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

J.B.C.O., J.E.C.M., minor child J.S.C.M.,
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

**MOTION TO REOPEN JUDGMENT
AND THIRD 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. After the filing of multiple orders to show cause, Petitioners were finally released on January 25, 2026.

Upon their release, however, Respondents refused to return J.B.C.O.'s driver's license and work permit and J.S.C.M.'s work permit. Respondents also imposed conditions of release on all of the Petitioners except J.S.C.M.

Undersigned counsel and Respondents' immigration counsel have endeavored to have the property of J.B.C.O. and J.S.C.M. returned. Respondent ICE has indicated that these documents are being kept in Texas, and to date, refused to cooperate in returning these records to Petitioners.

Accordingly, Petitioners move this Court to reopen the judgment entered in this case and issue an order to show cause why Petitioners' property should not be returned and their conditions of release rescinded.

Respectfully submitted,

Date: February 9, 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