

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

Victor Ivan Sanchez Abad,

Petitioner,

0:26-cv-00443-PJS-ECW

v.

Pamela Bondi, Attorney General,

Daren K. Margolin, Director for Executive
Office for Immigration Review,

Executive Office for Immigration Review,

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

**MOTION TO ENFORCE
JUDGMENT UNDER RULE
70**

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement, and

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

and

Ryan Shea, Freeborn County Sheriff,

Respondents.

ENFORCE JUDGMENT UNDER RULE 70

Petitioner files this motion pursuant to Rule 70, requesting that Respondents release Petitioner and do so immediately and do so in Minnesota. This Court ordered that Respondent's release Petitioner "immediately." ECF No. 8. That order was issued on January 26, 2025. *See id.* Despite this, Petitioner remains in Freeborn County Detention Center. *See* ECF No. 10-2.

In light of this willful refusal to comply with the Court's order, particularly given that Respondents do not even need to transfer Petitioner from Texas to Minnesota, Petitioner respectfully requests that he be released immediately, and that the Court order Respondents to refrain from placing any additional conditions on Petitioner upon his release, that they return all of his property, including, but not limited to, any and all identification, employment authorization, and/or driver's licenses, car keys, phones, electronics and any and all other property. Petitioner understands that Respondents are busy, but respectfully requests that the Agency respect this Court's orders and release him unconditionally, and with all of his property.

DATED: January 29, 2026

Respectfully submitted,

/s/ Cameron Giebink

Cameron Giebink

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