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UNITED STATES DISTRICT COURT
FEDERAL DISTRICT COURT OF IDAHO

Rigoberto GARCIA ORTIZ
Petitioner,

v.

Brian Henkey, Field Office Director of
Enforcement and Removal Operations, Salt
Lake City Field Office, Immigration and
Customs Enforcement; Kenneth PORTER,
Acting Director of the Boise U.S. Immigration
and Customs Enforcement Field Sub-Office;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; Executive Office of
Immigration Review,

Respondents.

Case No. 1:26-cv-43

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

Petitioner moves this Court for a Temporary Restraining Order barring Respondents from removing the Petitioner from the District of Idaho; prohibiting Respondents from communicating with Petitioner concerning his rights, responsibilities, or possible outcomes of any proceeding regarding his removal from the United States or these proceedings, absent the presence of counsel; ordering his immediate release from custody; and barring Respondents from taking any further action to effect his removal from the United States, so as to maintain the status quo.

DATED this 25th day of January 2026.

/s/ Nikki Ramirez-Smith
Nikki Ramirez-Smith
Attorney for Petitioner