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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF ALASKA

8 S.A.E.A. (adult), individually and as parent and
9 next friend to her minor children, A.A.E.A.
10 (adult child of S.A.E.A), C.I.C.E. (minor child
of S.A.E.A), and M.M.E.A. (minor child of
S.A.E.A)

11 Petitioners,

12 v.

13 Laura HERMOSILLO, Acting Field Office
14 Director of Enforcement and Removal
Operations, Seattle Field Office, Immigration
15 and Customs Enforcement; Kristi NOEM,
Secretary, U.S. Department of Homeland
16 Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; Pamela BONDI,
17 U.S. Attorney General; EXECUTIVE OFFICE
FOR IMMIGRATION REVIEW.

18 Respondents.
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Case No. 3:26-cv-00072-HRH

**EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER –
IMMEDIATE CONSIDERATION
REQUESTED**

1 Pursuant to Fed. R. Civ. P. 65, and for the reasons stated in the Complaint and all
2 pleadings filed, Petitioners respectfully move this Court to issue an immediate temporary
3 restraining order (TRO): 1) prohibiting all Respondents from transferring Petitioners outside
4 Alaska pending adjudication of the habeas petition; and 2) ordering immediate release of
5 Petitioners from Respondents' custody under reasonable circumstances.

6 Immediate and irreparable injury, loss, or damage will result to Petitioners before the
7 adverse parties can be heard in opposition. Accordingly, Petitioners request that the Court
8 immediately enter a temporary restraining order. A proposed order is submitted to the Court
9 contemporaneously with this motion. Petitioners also request that this Court waive the
10 requirement for bond or security. *See* Fed. R. Civ. P. 65(c).

11 Respectfully submitted this 17th of February, 2026.

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14 /s/ Lara Erin Nations

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