

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SUSAN TINCHER, JOHN BIESTMAN,
JANET LEE, LUCIA WEBB,
ABDIKADIR NOOR, and ALAN
CRENSHAW, *on behalf of themselves and
other similarly situated individuals,*

Case No. 25-cv-04669 KMM/DTS

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S.
Department of Homeland Security (DHS);
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement
(ICE); MARCOS CHARLES, Acting
Executive Associate Director,
Enforcement and Removal Operations
(ERO), ICE; DAVID EASTERWOOD,
Acting Field Office Director, ERO, ICE
Saint Paul Field Office; JOHN A.
CONDON, Acting Executive Associate
Director, Homeland Security
Investigations (HSI); The Department of
Homeland Security; Unidentified Federal
Agencies; and Unidentified Federal
Agents; *in their official capacities,*

**PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER**

Defendants.

Plaintiffs Susan Tinchler, John Biestman, Janet Lee, Lucia Webb, Abdikadir Noor, and Alan Crenshaw (collectively, "Plaintiffs") hereby move the Court pursuant to Rule 65(b) of the Federal Rules of Civil Procedure for entry of a temporary restraining order. The grounds for this motion are set forth in the accompanying brief, the arguments of counsel, and all of the papers and proceedings in this matter.

Dated: December 18, 2025

/s/ Kyle W. Wislocky

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