

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

SUSAN TINCER, 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 Tincher, John Biestman, Janet Lee, Lucia Webb, Abdiadir 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

---

Teresa Nelson (#269736)  
Catherine Ahlin-Halverson (#350473)  
Alicia Granse (#400771)  
**AMERICAN CIVIL LIBERTIES UNION  
OF MINNESOTA**  
P.O. Box 14720  
Minneapolis, MN 55414  
Tel: (651) 529-1692  
[tnelson@aclu-mn.org](mailto:tnelson@aclu-mn.org)  
[cahlin@aclu-mn.org](mailto:cahlin@aclu-mn.org)  
[agranse@aclu-mn.org](mailto:agranse@aclu-mn.org)

Kyle W. Wislocky (#393492)  
Jacob F. Siegel (#399615)  
**CIRESI CONLIN LLP**  
225 S. 6th St., Suite 4600  
Minneapolis, MN 55402  
Tel: (612) 361-8233  
[kww@ciresiconlin.com](mailto:kww@ciresiconlin.com)  
[jfs@ciresiconlin.com](mailto:jfs@ciresiconlin.com)

Caitlinrose H. Fisher (#398358)  
Rebecca Rogers (#403827)  
**FORSGREN FISHER MCCALMONT  
DEMAREA TYSVER LLP**  
225 South Sixth Street  
Suite 1500  
Minneapolis, MN 55402  
Tel: (612)-474-3310  
[cfisher@forsgrenfisher.com](mailto:cfisher@forsgrenfisher.com)  
[rrogers@forsgrenfisher.com](mailto:rrogers@forsgrenfisher.com)

Kevin C. Riach (#389277)  
**THE LAW OFFICE OF KEVIN C. RIACH**  
125 Main St. SE, Suite 339  
Minneapolis, MN 55414  
(612) 203-8555  
[kevin@riachdefense.com](mailto:kevin@riachdefense.com)

***ATTORNEYS FOR PLAINTIFF***

