

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MUBASHIR KHALIF HUSSEN,
MAHAMED EYDARUS, and JAVIER DOE
*on behalf of themselves and others similarly
situated,*

Plaintiffs,

v.

KRISTI NOEM, *in her official capacity as
Secretary of the U.S. Department of
Homeland Security*; U.S. DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; TODD M. LYONS, *in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement*;
DAVID EASTERWOOD, *in his official
capacity as U.S. Immigration and Customs
Enforcement Field Office Director for St.
Paul, Minnesota*; U.S. CUSTOMS AND
BORDER PROTECTION; RODNEY S.
SCOTT, *in his official capacity as
Commissioner of U.S. Customs and Border
Protection*; U.S. BORDER PATROL;
MICHAEL W. BANKS, *in his official
capacity as Chief of U.S. Border Patrol*; and
GREGORY BOVINO, *in his official capacity
as Commander-at-Large of U.S. Border
Patrol,*

Defendants.

Case No. 0:26-cv-324-ECT-ECW

**PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

**EXPEDITED HANDLING
REQUESTED**

Plaintiffs Mubashir Khalif Hussien, Mahamed Eydarus, and Javier Doe (collectively, “Plaintiffs”) hereby move the Court pursuant to Federal Rule of Civil Procedure 65(a) for entry of a preliminary injunction and, because of ongoing irreparable harm to Plaintiffs and all others similarly situated, seek expedited handling of this Motion. The grounds for this Motion are set forth in the accompanying brief, the arguments of counsel, and all the proceedings and papers submitted in this matter.

Dated: January 16, 2026

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* *Pro Hac Vice admissions pending*