

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

STATE OF MINNESOTA,
by and through its Attorney General Keith
Ellison, CITY OF MINNEAPOLIS, and
CITY OF ST. PAUL,

Case No. 0:26-cv-00190-KMM-DJF

Plaintiffs,

**PLAINTIFFS' MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

v.

KRISTI NOEM, in her official capacity as
Secretary of the U.S. Department of
Homeland Security; JOHN CONDON, in
his official capacity as Acting Executive
Associate Director of Homeland Security
Investigations; U.S. Department of
Homeland Security; TODD LYONS, in
his official capacity as Acting Director of
U.S. Immigration and Customs
Enforcement; MARCOS
CHARLES, in his official capacity as
Acting Executive Associate
Director, Enforcement and Removal
Operations; U.S. Immigration and
Customs Enforcement; RODNEY
SCOTT, in his official capacity as
Commissioner of U.S. Customs and
Border Protection; U.S. Customs and
Border Protection; GREGORY BOVINO,
in his official capacity as Commander of
the U.S. Border Patrol; U.S. Border
Patrol; DAVID EASTERWOOD, in his
official capacity as Acting Director, Saint
Paul Field Office, U.S. Immigration and
Customs Enforcement,

Defendants.

Plaintiffs State of Minnesota, by and through its Attorney General Keith Ellison, the City of Minneapolis, and the City of St. Paul (collectively, “Plaintiffs”) move the Court pursuant to Fed. R. Civ. P. 65(b), D. Minn. L.R. 7.1(d), and the Court’s inherent authority for a temporary restraining order. The grounds for this motion are set forth in the accompanying memorandum of law, supporting declarations, arguments of counsel, and all other documents on record with the Court.

Respectfully submitted,

Dated: January 12, 2026

KEITH ELLISON
Attorney General
State of Minnesota

By: /s/ Brian S. Carter

BRIAN S. CARTER (#0390613)
Special Counsel

LIZ KRAMER (#0325089)
Solicitor General

PETER J. FARRELL (#0393071)
Deputy Solicitor General

KATHERINE BIES (#0401675)
LINDSEY MIDDLECAMP (#0392589)
JOSEPH RICHIE (#0400615)
Special Counsel

445 Minnesota Street, Suite 600
St. Paul, Minnesota 55101-2125
(651) 757-1010 (Voice)
(651) 282-5832 (Fax)

liz.kramer@ag.state.mn.us
peter.farrell@ag.state.mn.us
brian.carter@ag.state.mn.us
katherine.bies@ag.state.mn.us
joseph.richie@ag.state.mn.us
lindsey.middlecamp@ag.state.mn.us

Attorneys for Plaintiff State of Minnesota

Dated: January 12, 2026

KRISTYN ANDERSON
City Attorney
/s/ Kristyn Anderson
KRISTYN ANDERSON (0267752)
HEATHER P. ROBERTSON (0390470)
Assistant City Attorney
SARA J. LATHROP (0310232)
Assistant City Attorney
KIRSTEN H. PAGEL (0399114)
Assistant City Attorney
350 South Fifth Street
Minneapolis, MN 55415
Tel: 612-673-3000
kristyn.anderson@minneapolismn.gov
sara.lathrop@minneapolismn.gov
heather.robertson@minneapolismn.gov
kirsten.pagel@minneapolismn.gov

Attorneys for Plaintiff City of Minneapolis

Dated: January 12, 2026

IRENE KAO
City Attorney
By: /s/ Kelsey McElveen
PORTIA HAMPTON-FLOWERS
(0210869)
Deputy City Attorney
KELSEY MCELVEEN (0396744)
Assistant City Attorney
ALEXANDER HSU (0399275)
Assistant City Attorney
15 W. Kellogg Blvd., #400
Saint Paul, MN 55102
Tel: 651-266-8710
Portia.flowers@ci.stpaul.mn.us
Kelsey.mcelveen@ci.stpaul.mn.us
Alexander.hsu@ci.stpaul.mn.us

Attorneys for Plaintiff City of Saint Paul