

Michael T. Purcell
Attorney at Law
P.O. Box 14209
Portland, OR 97293-0209
(503) 241-8203
mpurcell.law@gmail.com

Counsel for petitioner.

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

S.F.,

Petitioner,

vs.

DREW BOSTOCK, Seattle Field Office
Director, U.S. Immigration and Customs
Enforcement and Removal Operation, KRISTI
NOEM, Secretary of Homeland Security,
PAMELA BONDI, Attorney General, TODD
LYONS, Acting Director of Immigration and
Customs Enforcement, U.S. DEPARTMENT
OF HOMELAND SECURITY, U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT, and U.S. DEPARTMENT
OF JUSTICE

Respondents.

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Agency No.

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**MOTION FOR TEMPORARY
RESTRAINING ORDER**

ORAL ARGUMENT
REQUESTED

Expedited hearing requested

The petitioner moves the court for a temporary restraining order barring the

respondents from removing the petitioner from the District of Oregon absent further order from this court.

Dated this 24th day of June 2025

/s/ Michael T. Purcell

MICHAEL T. PURCELL
OSB #853094
Attorney for petitioner