

MICHAEL T. PURCELL
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Counsel for petitioner.

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF OREGON

EUGENE DIVISION

B.D.A.A.,	)	File No. 6:25-cv-02062-AA
	)	
Petitioner,	)	Agency No.
	)	
vs.	)	XXXX-XXX-906
	)	
DREW BOSTOCK, Seattle Field Office	)	MOTION FOR TEMPORARY
Director, U.S. Immigration and Customs	)	RESTRAINING ORDER
Enforcement and Removal Operation, KRISTI	)	
NOEM, Secretary of Homeland Security,	)	ORAL ARGUMENT
PAMELA BONDI, Attorney General, TODD	)	REQUESTED
LYONS, Acting Director of Immigration and	)	
Customs Enforcement, U.S. DEPARTMENT	)	Expedited hearing requested
OF HOMELAND SECURITY, U.S.	)	
IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT, and U.S. DEPARTMENT	)	
OF JUSTICE	)	
	)	
Respondents.	)	

The petitioner moves the court for a temporary restraining order barring the respondents from removing her from the state of Oregon or the state of Washington.

This motion is based on the attached declaration of counsel and the authorities contained in the amended petition for habeas corpus.

Dated this 5th day of November 2025

/s/ Michael T. Purcell

MICHAEL T. PURCELL
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Attorney for petitioner