

Nicholas Costa
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Counsel for petitioner.

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

J.Y.L.C.,	)	File No.
	)	
Petitioner,	)	
	)	Agency No.
vs.	)	
	)	
DREW BOSTOCK, Seattle Field Office	)	
Director, U.S. Immigration and Customs	)	MOTION FOR
Enforcement and Removal Operation, KRISTI	)	TEMPORARY
NOEM, Secretary of Homeland Security,	)	RESTRAINING ORDER
PAMELA BONDI, Attorney General, TODD	)	
LYONS, Acting Director of Immigration and	)	ORAL ARGUMENT
Customs Enforcement, U.S. DEPARTMENT	)	REQUESTED
OF HOMELAND SECURITY, U.S.	)	
IMMIGRATION AND CUSTOMS	)	Expedited hearing requested
ENFORCEMENT, and U.S. DEPARTMENT	)	
OF JUSTICE	)	
	)	
Respondents.	)	

Petitioner moves the court for a temporary restraining order barring respondents from removing the petitioner from the District of Oregon and ordering his immediate

release from custody.

Dated this 8th day of November 2025

/s/ Nicholas Costas
OSB #130939
Attorney for petitioner

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Petitioner,	)	
	)	Agency No.
vs.	)	
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DREW BOSTOCK, Seattle Field Office	)	
Director, U.S. Immigration and Customs	)	DECLARATION IN
Enforcement and Removal Operation, KRISTI	)	SUPPORT OF MOTION FOR
NOEM, Secretary of Homeland Security,	)	TEMPORARY
PAMELA BONDI, Attorney General, TODD	)	RESTRAINING ORDER
LYONS, Acting Director of Immigration and	)	
Customs Enforcement, U.S. DEPARTMENT	)	ORAL ARGUMENT
OF HOMELAND SECURITY, U.S.	)	REQUESTED
IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT, and U.S. DEPARTMENT	)	Expedited hearing requested
OF JUSTICE	)	
	)	
Respondents.	)	

Under penalty of perjury, the undersigned does solemnly declare:

1. My name is **Nicholas Costa**. I am member of the Oregon State Bar and admitted

DECLARATION IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER

to practice before this court. If called upon to testify in this matter, I would be able to give the following evidence:

2. Counsel learned on November 8, 2025, at approximately 10:00 a.m., that Petitioner had been arrested and taken into custody by officers of U.S. Immigration and Customs Enforcement (ICE). Counsel was informed of the arrest through a telephone call from Petitioner's mother, who reported that ICE agents had apprehended Petitioner earlier that morning at or near Petitioner's residence in Aloha, Oregon.
3. Prior to this arrest, Petitioner had been fully compliant with all immigration requirements and had a pending asylum application with a merits hearing scheduled for December 2025. The sudden detention, therefore, represents a drastic and unexpected change in Petitioner's circumstances.
4. Counsel has not received any formal notice or documentation from ICE regarding the basis for custody, nor has Petitioner been afforded a custody redetermination hearing. Given Petitioner's pending asylum case, lack of criminal history, and family ties in the community, the continued detention is unlawful and inflicts irreparable harm. Immediate relief is necessary to prevent ongoing violations of Petitioner's constitutional and statutory rights, to ensure access to counsel, and to preserve the integrity of the pending immigration proceedings
5. I have conducted an appropriate inquiry into the circumstances of this case, and I believe that all factual allegations contained in the petition for habeas corpus are true.

6. Based on news reports and contact with other immigration lawyers, I believe that respondents intend either to remove petitioner from the District of Oregon, either to the respondents' detention center in Tacoma, Washington, or further, possibly to a detention facility in Louisiana. In either case, it will be made much more difficult for petitioner to contest the lawfulness of his detention by way of a petition for habeas corpus.

7. There is also a possibility that respondents may seek to immediately remove the respondent from the United States, include to a country of which the petitioner is neither a citizen nor a national.

8. Following the filing of this Petition and the accompanying Motion for Temporary Restraining Order, Counsel made reasonable efforts to notify the Office of the United States Attorney for the District of Oregon of the filing. On November 8, 2025, Counsel attempted to contact the U.S. Attorney's Office by telephone to advise them that an emergency motion for a temporary restraining order would be filed. However, the office was closed on Saturday, November 8, 2025, and no staff were available to receive notice in person or by phone. Counsel will promptly serve copies of the Petition and Motion upon the U.S. Attorney's Office and the Office of Immigration and Customs Enforcement by electronic and overnight mail on the next business day, Monday, November 10, 2025.

Dated this 8th day of November 2025

/s/ Nicholas Costas
OSB #130939
Attorney for petitioner