

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PABLO MORENO GONZALEZ, FELIPE
AGUSTIN ZAMACONA, and a class of
similarly situated people,

Plaintiffs,

v.

KRISTI NOEM, Secretary of the U.S.
Department of Homeland Security, in her official
capacity; TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement, in his
official capacity; MARCOS CHARLES, Acting
Executive Associate Director, U.S. Immigration
and Customs Enforcement and Removal
Operations, in his official capacity;
SAMUEL OLSON, Interim Chicago Field
Office Director, U.S. Immigration and Customs
Enforcement, in his official capacity;
GREGORY BOVINO, Commander-at-Large,
U.S. Customs and Border Protection, in his
official capacity; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.
CUSTOMS AND BORDER PROTECTION;
and the DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 25-cv-13323

Class Action

PLAINTIFFS EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiffs Pablo Moreno Gonzalez and Felipe Agustin Zamacona, by and through their undersigned counsel, bring this Emergency Motion for a Temporary Restraining Order under Rule 65(b) of the Federal Rules of Civil Procedure. For the reasons set forth in their contemporaneously filed Memorandum in Support of Emergency Motion for Temporary Restraining Order, Plaintiffs respectfully request that the Court grant a temporary restraining order to remedy ongoing

violations of the constitutional rights of Plaintiffs and the putative class. A [Proposed] Temporary Restraining Order is attached to this Motion as Exhibit A.

WHEREFORE, Plaintiffs Pablo Moreno Gonzalez and Felipe Agustin Zamacona respectfully request the Court grant this Motion and the relief sought in the attached [Proposed] Temporary Restraining Order.

DATED: October 30, 2025

Respectfully submitted,

/s/ Kevin M. Fee

Kevin M. Fee

Michelle T. García

Rebecca K. Glenberg

Samuel Cole

Jennifer Stark

Kathleen Hickey

**ROGER BALDWIN FOUNDATION OF
ACLU, INC.**

150 N. Michigan, Suite 600

Chicago, IL 60601

Phone: (312) 201-9740

Fax: (312) 288-5225

kfee@aclu-il.org

mgarcia@aclu-il.org

rglenberg@aclu-il.org

scole@aclu-il.org

jstark@aclu-il.org

khickey@aclu-il.org

Alexa Van Brunt

Jonathan Manes

Danielle Berkowsky

Chisato Kimura (license pending)

MACARTHUR JUSTICE CENTER

160 E. Grand Avenue, 6th floor

Chicago, Illinois 60611

Phone: 312-503-1336

alexa.vanbrunt@macarthurjustice.org

jonathan.manes@macarthurjustice.org

danielle.berkowsky@macarthurjustice.org

chisato.kimura@macarthurjustice.org

Nathan P. Eimer
Scott C. Solberg
Michael L. McCluggage
James B. Speta
Lisa S. Meyer
Brent R. Austin
EIMER STAHL LLP
224 South Michigan Avenue, Suite 1100
Chicago, Illinois 60604
Phone: 312-660-7600
neimer@eimerstahl.com
ssolberg@eimerstahl.com
mmcluggage@eimerstahl.com
jspeta@eimerstahl.com
lmeyer@eimerstahl.com
baustin@eimerstahl.com