

Lee Gelernt*
 Judy Rabinovitz*
 Omar C. Jadwat*
 Anand Balakrishnan*
 Celso Perez**(SBN 304924)
 ACLU FOUNDATION
 IMMIGRANTS' RIGHTS PROJECT
 125 Broad Street, 18th Floor
 New York, NY 10004
 T: (212) 549-2660
 F: (212) 549-2654
 lgelernt@aclu.org
 jrabinovitz@aclu.org
 ojadwat@aclu.org
 abalakrishnan@aclu.org
 cperez@aclu.org

Jennifer Chang Newell (SBN 233033)
 Cody Wofsy (SBN 294179)
 Julie Veroff** (SBN 310161)
 ACLU FOUNDATION
 IMMIGRANTS' RIGHTS PROJECT
 39 Drumm Street
 San Francisco, CA 94111
 T: (415) 343-0770
 F: (415) 395-0950
 jnewell@aclu.org
 cwofsy@aclu.org
 jveroff@aclu.org

Attorneys for Plaintiffs (Additional counsel listed on following page)

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

East Bay Sanctuary Covenant; Al Otro Lado;
 Innovation Law Lab; and Central American
 Resource Center in Los Angeles,

Plaintiffs,

v.

Donald J. Trump, President of the United States, in
 his official capacity; Matthew G. Whitaker, Acting
 Attorney General, in his official capacity; U.S.
 Department of Justice; James McHenry, Director
 of the Executive Office for Immigration Review,
 in his official capacity; the Executive Office for
 Immigration Review; Kirstjen M. Nielsen,
 Secretary of Homeland Security, in her official
 capacity; U.S. Department of Homeland Security;
 Lee Francis Cissna, Director of the U.S.
 Citizenship and Immigration Services, in his
 official capacity; U.S. Citizenship and
 Immigration Services; Kevin K. McAleenan,
 Commissioner of U.S. Customs and Border
 Protection, in his official capacity; U.S. Customs
 and Border Protection; Ronald D. Vitiello, Acting
 Director of Immigration and Customs
 Enforcement, in his official capacity; Immigration
 and Customs Enforcement,

Defendants.

Case No.: 18-cv-06810

**[PROPOSED] TEMPORARY
 RESTRAINING ORDER**

[IMMIGRATION ACTION]

1 Melissa Crow*
2 SOUTHERN POVERTY LAW CENTER
3 1666 Connecticut Avenue NW, Suite 100
4 Washington, D.C. 20009
5 T: (202) 355-4471
6 F: (404) 221-5857
7 *melissa.crow@splcenter.org*

8 Mary Bauer*
9 SOUTHERN POVERTY LAW CENTER
10 1000 Preston Avenue
11 Charlottesville, VA 22903
12 T: (470) 606-9307
13 F: (404) 221-5857
14 *mary.bauer@splcenter.org*

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Attorneys for Plaintiffs

**Pro hac vice application forthcoming*

***Application for admission forthcoming*

Baher Azmy*
Angelo Guisado*
Ghita Schwarz*
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6464
F: (212) 614-6499
bazmy@ccrjustice.org
aguisado@ccrjustice.org
gschwarz@ccrjustice.org

Christine P. Sun (SBN 218701)
Vasudha Talla (SBN 316219)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN
CALIFORNIA, INC.
39 Drumm Street
San Francisco, CA 94111
T: (415) 621-2493
F: (415) 255-8437
csun@aclunc.org
vtalla@aclunc.org

1 Plaintiffs' application for a Temporary Restraining Order came before this Court for
2 consideration on November __, 2018. Upon consideration of the application, and for good cause
3 shown, IT IS HEREBY ORDERED as follows:

4 **Temporary Restraining Order**

5 The Court finds that Plaintiffs have demonstrated a substantial likelihood of success on the
6 merits of their claims that Defendants' Interim Final Rule of November 8, 2018, and Presidential
7 Proclamation of November 9, 2018, are in violation of (1) the Immigration and Nationality Act, and
8 (2) the Administrative Procedure Act. The Court further finds that Defendants' conduct as alleged
9 above has caused and, absent the requested relief, will continue to cause irreparable harm to
10 Plaintiffs. The balance of hardships tips sharply in Plaintiffs' favor, and the public interest will be
11 served by the injunction.
12

13 Accordingly, IT IS HEREBY ORDERED that, pending a hearing on whether a preliminary
14 injunction should issue, Defendants Donald J. Trump, President of the United States, in his official
15 capacity; Matthew G. Whitaker, Acting Attorney General, in his official capacity; U.S. Department
16 of Justice; James McHenry, Director of the Executive Office for Immigration Review, in his official
17 capacity; the Executive Office for Immigration Review; Kirstjen M. Nielsen, Secretary of Homeland
18 Security, in her official capacity; U.S. Department of Homeland Security; Lee Francis Cissna,
19 Director of the U.S. Citizenship and Immigration Services, in his official capacity; U.S. Citizenship
20 and Immigration Services; Kevin K. McAleenan, Commissioner of U.S. Customs and Border
21 Protection, in his official capacity; U.S. Customs and Border Protection; Ronald D. Vitiello, Acting
22 Director of Immigration and Customs Enforcement, in his official capacity; and Immigration and
23 Customs Enforcement, and all persons acting under their direction, are enjoined from implementing
24 or enforcing the Interim Final Rule and Presidential Proclamation.
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Order to Show Cause

Defendants are ordered to show cause before this Court why a preliminary injunction should not issue enjoining Defendants and their agents from implementing or enforcing the Interim Final Rule and Presidential Proclamation. The hearing on the order to show cause will be held on _____ at _____.

Plaintiffs' moving papers shall be filed and served on or before _____.

Defendants' opposition papers shall be filed and served on or before _____.

Plaintiffs' reply papers shall be filed and served on or before _____.

Issued this ____ day of _____, 2018.

United States District Judge