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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.

William Barr, 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; Kevin
K. McAleenan, Acting Secretary of Homeland
Security, in her official capacity; U.S. Department
of Homeland Security; Kenneth T. Cuccinelli,
Acting Director of the U.S. Citizenship and
Immigration Services, in his official capacity; U.S.
Citizenship and Immigration Services; John P.
Sanders, Acting Commissioner of U.S. Customs
and Border Protection, in his official capacity;
U.S. Customs and Border Protection; Matthew T.
Albence, Acting Director of Immigration and
Customs Enforcement, in his official capacity;
Immigration and Customs Enforcement,

Defendants.

Case No.: 19-cv-04073

**NOTICE OF MOTION AND MOTION
FOR A TEMPORARY RESTRAINING
ORDER**

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**Pro hac vice application forthcoming*

***Application for admission pending*

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1 TO RESPONDENTS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiffs East Bay Sanctuary Covenant, Al Otro Lado,
3 Innovation Law Lab, and Central American Resource Center of Los Angeles hereby move the Court
4 for a temporary restraining order enjoining Defendants and all persons associated with them from
5 implementing or enforcing the Interim Final Rule, Asylum Eligibility and Procedural Modifications,
6 84 Fed. Reg. 33,829 (July 16, 2019). Plaintiffs request a hearing on their motion on Thursday, July
7 18, 2019, at 2:30 p.m., in light of the irreparable harm that Plaintiffs will face if the Interim Final
8 Rule is not enjoined.

9 This motion is brought pursuant to Federal Rule of Civil Procedure 65 and is based on the
10 accompanying Memorandum in Support and materials cited therein; the pleadings and evidence on
11 file in this matter; the accompanying declarations; and such other materials and argument as may be
12 presented in connection with the hearing on the motion.

13 Pursuant to Civil L.R. 65-1(b), counsel for Plaintiffs provided notice to Defendants on July
14 16, 2019, by email to Erez R. Reuveni, Counsel for Defendants. Counsel for Plaintiffs will promptly
15 send a copy of these filings to Mr. Reuveni by email.

16 Counsel for Defendants requested that Plaintiffs submit the following statement on their
17 behalf: Defendants oppose the motion for temporary restraining order and the proposed hearing date
18 of Thursday, July 18, and will propose a briefing schedule in due course.
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Dated: July 17, 2019

Respectfully submitted,

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