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**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
 McAleenan, Acting Secretary of Homeland
 Security, in his official capacity; U.S. Department
 of Homeland Security; Ken Cuccinelli, Acting
 Director of the U.S. Citizenship and Immigration
 Services, in his official capacity; U.S. Citizenship
 and Immigration Services; John Sanders,
 Commissioner of U.S. Customs and Border
 Protection, in his official capacity; U.S. Customs
 and Border Protection; Matthew Albence, Acting
 Director of Immigration and Customs
 Enforcement, in his official capacity; Immigration
 and Customs Enforcement,

Defendants.

Case No.: 3:19-cv-04073

**[PROPOSED] TEMPORARY
 RESTRAINING ORDER**

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**Pro hac vice application forthcoming*

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1 Plaintiffs' application for a Temporary Restraining Order came before this Court for
 2 consideration on July __, 2019. Upon consideration of the application, and for good cause shown,
 3 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 July 16, 2019 violates (1) the
 7 Immigration and Nationality Act, and (2) the Administrative Procedure Act. The Court further finds
 8 that, absent the requested relief, the Interim Final Rule will cause irreparable harm to Plaintiffs. The
 9 balance of hardships tips sharply in Plaintiffs' favor, and the public interest will be served by a
 10 Temporary Restraining Order.
 11

12 Accordingly, IT IS HEREBY ORDERED that, pending a hearing on whether a preliminary
 13 injunction should issue, William Barr, Attorney General, in his official capacity; U.S. Department of
 14 Justice; James McHenry, Director of the Executive Office for Immigration Review, in his official
 15 capacity; the Executive Office for Immigration Review; Kevin K. McAleenan, Acting Secretary of
 16 Homeland Security, in his official capacity; U.S. Department of Homeland Security; Kenneth T.
 17 Cuccinelli, Acting Director of the U.S. Citizenship and Immigration Services, in his official
 18 capacity; U.S. Citizenship and Immigration Services; John P. Sanders, Commissioner of U.S.
 19 Customs and Border Protection, in his official capacity; U.S. Customs and Border Protection;
 20 Matthew T. Albence, Acting Director of Immigration and Customs Enforcement, in his official
 21 capacity; Immigration and Customs Enforcement; and all persons acting under their direction, are
 22 enjoined from implementing or enforcing the Interim Final Rule.
 23
 24

25 **Order to Show Cause**

26 Defendants are ordered to show cause before this Court why a preliminary injunction should
 27 not issue enjoining Defendants and their agents from implementing or enforcing the Interim Final
 28 Rule. 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 _____, 2019.

United States District Judge