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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Ms. L. and Ms. C.,	Case No. 18-cv-00428-DMS-MDD
Petitioners-Plaintiffs,	
v.	Date Filed: March 9, 2018
U.S. Immigration and Customs Enforcement ("ICE"); U.S. Department of Homeland Security ("DHS"); U.S. Customs and Border Protection ("CBP"); U.S. Citizenship and Immigration Services ("USCIS"); U.S. Department of Health and Human Services ("HHS"); Office of Refugee Resettlement ("ORR"); Thomas Homan, Acting Director of ICE; Greg Archambeault, San Diego Field Office Director, ICE; Joseph Greene, San Diego Assistant Field Office Director, ICE; Adrian P. Macias, El Paso Field Director, ICE; Frances M. Jackson, El Paso Assistant Field Office Director, ICE; Kirstjen Nielsen, Secretary of DHS; Jefferson Beauregard Sessions III, Attorney General of the United States; L. Francis Cissna, Director of USCIS; Kevin K. McAleenan, Acting Commissioner of CBP; Pete Flores, San Diego Field Director, CBP; Hector A. Mancha Jr., El Paso Field Director, CBP; Alex Azar, Secretary of the Department of Health and Human Services; Scott Lloyd, Director of the Office of Refugee Resettlement,	**NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION**
Respondents-Defendants.	

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that as soon as the matter may be heard at a date and time to be designated by the Court, Plaintiffs-Petitioners will and hereby do move this Court for an order granting class certification of the proposed class defined as follows:

> All adult parents nationwide who (1) are or will be detained in immigration custody by the Department of Homeland Security, and (2) have a minor child who is or will be separated from them by DHS and detained in ORR custody, absent a demonstration in a hearing that the parent is unfit or presents a danger to the child.

Plaintiffs-Petitioners' Motion for Class Certification is based on this Notice of Motion and Motion for Class Certification; the concurrently-filed Memorandum in Support of Plaintiff-Petitioners' Motion for Class Certification; the Declaration of Bardis Vakili in Support of Plaintiffs-Petitioners' Motion for Class Certification and exhibits attached thereto; all papers, pleadings, records, and files in this case; all matters of which judicial notice may be taken; and such other arguments and/or evidence as may be presented to this Court at a hearing on this Motion.

Plaintiffs-Petitioners respectfully request a hearing on this Motion.

Dated: March 9, 2018   Respectfully Submitted,

/s/Lee Gelernt
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