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12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 Ms. L., et al.,

15 *Petitioners-Plaintiffs,*

16 v.

17 U.S. Immigration and Customs Enforcement
18 ("ICE"), et al.,

19 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

Date Filed: June 6, 2019

**NOTICE OF MOTION AND
MOTION TO ALLOW
PARENTS DEPORTED
WITHOUT THEIR CHILDREN
TO TRAVEL TO THE UNITED
STATES**

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1 Plaintiffs respectfully move that the Court to order the government to allow
2 21 parents who were separated from their children and deported to travel to the
3 United States to obtain an opportunity to reunify with their children, who remain in
4 the United States.

5 Plaintiffs' Motion is based on this Notice of Motion and Motion and the
6 concurrently-filed Memorandum and exhibits in support; all papers, pleadings,
7 records, and files in this case; all matters of which judicial notice may be taken; and
8 such other arguments and/or evidence as may be presented to this Court at a hearing
9 on this Motion.

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1 Dated: June 6, 2019

Respectfully Submitted,

/s/Lee Gelernt

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CERTIFICATE OF SERVICE

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I hereby certify that on June 6, 2019, I electronically filed the foregoing with the Clerk for the United States District Court for the Southern District of California by using the appellate CM/ECF system. A true and correct copy of this brief has been served via the Court’s CM/ECF system on all counsel of record.

/s/ Lee Gelernt
Lee Gelernt, Esq.
Dated: June 6, 2019