

1 CHAD A. READLER
 Acting Assistant Attorney General
 2 MCGREGOR SCOTT
 United States Attorney
 3 AUGUST FLENTJE
 Special Counsel
 4 WILLIAM C. PEACHEY
 Director
 5 EREZ REUVENI
 Assistant Director, Office of Immigration Litigation
 6 U.S. Department of Justice, Civil Division
 7 P.O. Box 868, Ben Franklin Station
 8 Washington, DC 20044
 Tel. (202) 307-4293
 9 Erez.R.Reuveni@usdoj.gov
 10 DAVID SHELEDY
 Civil Chief, Assistant United States Attorney
 11 LAUREN C. BINGHAM
 JOSEPH A.DARROW
 12 JOSHUA S. PRESS
 Trial Attorneys
 13 *Attorneys for the United States*

14
 15 **UNITED STATES DISTRICT COURT**
 16 **EASTERN DISTRICT OF CALIFORNIA**

17 THE UNITED STATES OF AMERICA,
 18
 19 Plaintiff,

No. 18-264

20 v.

**NOTICE OF MOTION AND MOTION
 FOR PRELIMINARY INJUNCTION**

21 THE STATE OF CALIFORNIA;
 EDMUND GERALD BROWN JR.,
 Governor of California, in his Official
 22 Capacity; and XAVIER BECERRA,
 Attorney General of California, in his
 23 Official Capacity,

24 Defendants.
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1 **NOTICE**

2 Notice is hereby given that the United States of America makes the following motion,
3 which it proposes to notice for a hearing on April 5, 2018 at a as of yet to be determined
4 courtroom.

5 **MOTION**

6 The United States hereby moves for a preliminary injunction enjoining enforcement of
7 certain provisions of California law enacted through Assembly Bill 450 (“AB 450”), Assembly
8 Bill 103 (“AB 103”), and Senate Bill 54 (“SB 54”). As detailed in the accompanying proposed
9 order, the United States respectfully requests that this Court preliminarily enjoin Sections 7285.1,
10 7285.2, 7284.6(a)(1)(C) & (D), 7284.6(a)(4), and 12532 of the California Government Code, and
11 Sections 90.2 and 1019.2 of the California Labor Code.
12

13 This motion is based on the memorandum and exhibits filed herewith, and the pleadings
14 on file.

15 DATED: March 6, 2018

16 CHAD A. READLER
Acting Assistant Attorney General

17 MCGREGOR SCOTT
18 United States Attorney

19 AUGUST FLENTJE
20 Special Counsel

21 WILLIAM C. PEACHEY
22 Director

23 */s/ Erez Reuveni*
24 EREZ REUVENI
Assistant Director
25 U.S. Department of Justice, Civil Division
Office of Immigration Litigation
26 P.O. Box 868, Ben Franklin Station
Washington, DC 20044
27 Telephone: (202) 307-4293
28 Fax: (202) 616-8202
E-mail: Erez.R.Reuveni@usdoj.gov

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DAVID SHELEDY
Civil Chief, Assistant United States
Attorney

LAUREN BINGHAM
JOSEPH A. DARROW
JOSHUA S. PRESS
Trial Attorneys

Attorneys for Plaintiff