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

Ms. L.,

*Petitioner-Plaintiff,*

v.

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, Otay Detention Facility;  
 Kirstjen Nielsen, Secretary of DHS; Jefferson  
 Beauregard Sessions III, Attorney General of the  
 United States; Kevin K. McAleenan, Acting  
 Commissioner of CBP; L. Francis Cissna,  
 Director of USCIS; Pete Flores, San Diego Field  
 Director, CBP; Fred Figueroa, Warden, Otay  
 Mesa Detention Center; Alex Azar, Secretary of  
 the Department of Health and Human Services;  
 Scott Lloyd, Director of the Office of Refugee  
 Resettlement,

*Respondents-Defendants.*

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

Date Filed: March 2, 2018

**PETITIONER-PLAINTIFF  
 NOTICE OF MOTION AND  
 MOTION FOR  
 PRELIMINARY  
 INJUNCTION**

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Spencer E. Amdur (SBN 320069)  
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Petitioner-Plaintiff moves for a preliminary injunction to enjoin Respondents-Defendants from continuing to separate her from her daughter. The motion is based on the accompanying memorandum and exhibits.

Dated: March 2, 2018

Respectfully Submitted,

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/s/Lee Gelernt  
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*\*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

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I hereby certify that on March 2, 2018, 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: March 2, 2018