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Petitioner-Plaintiff moves for a preliminary injunction to enjoin 1 2 Respondents-Defendants from continuing to separate her from her daughter. 3 The motion is based on the accompanying memorandum and (corrected) 4 exhibits. 5 Dated: March 3, 2018 Respectfully Submitted, 6 /s/Lee Gelernt 7 Bardis Vakili (SBN 247783) Lee Gelernt* ACLU FOUNDATION OF SAN Judy Rabinovitz* 8 **DIEGO & IMPERIAL COUNTIES** Anand Balakrishnan* P.O. Box 87131 AMERICAN CIVIL LIBERTIES 9 San Diego, CA 92138-7131 UNION FOUNDATION T: (619) 398-4485 F: (619) 232-0036 IMMIGRANTS' RIGHTS PROJECT 10 125 Broad St., 18th Floor New York, NY 10004 bvakili@aclusandiego.org 11 T: (212) 549-2660 Spencer E. Amdur (SBN 320069) F: (212) 549-2654 12 AMERICAN CIVIL LIBERTIES lgelernt@aclu.org UNION FOUNDATION jrabinovitz@aclu.org 13 IMMIGRANTS' RIGHTS PROJECT abalakrishnan@aclu.org 39 Drumm Street 14 San Francisco, CA 94111 T: (415) 343-1198 F: (415) 395-0950 15 samdur@aclu.org 16 17 18 *Admitted Pro Hac Vice 19 20 21 22 23 24 25 26 27 28

CERTIFICATE OF SERVICE I hereby certify that on March 3, 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 3,