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8 *Attorneys for Petitioners-Plaintiffs*
 9 *Additional counsel on next page*

**Admitted Pro Hac Vice*

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

12 Ms. L. and Ms. C.,

13 *Petitioners-Plaintiffs,*

14 v.

15 U.S. Immigration and Customs Enforcement
 16 (“ICE”); U.S. Department of Homeland Security
 17 (“DHS”); U.S. Customs and Border Protection
 18 (“CBP”); U.S. Citizenship and Immigration
 19 Services (“USCIS”); U.S. Department of Health
 20 and Human Services (“HHS”); Office of
 21 Refugee Resettlement (“ORR”); Thomas
 22 Homan, Acting Director of ICE; Greg
 23 Archambeault, San Diego Field Office Director,
 24 ICE; Joseph Greene, San Diego Assistant Field
 25 Office Director, ICE; Adrian P. Macias, El Paso
 26 Field Director, ICE; Frances M. Jackson, El Paso
 27 Assistant Field Office Director, ICE; Kirstjen
 28 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,

Respondents-Defendants.

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

Date Filed: March 9, 2018

**NOTICE OF MOTION AND
 MOTION FOR CLASS
 CERTIFICATION**

Hearing Date: April 27, 2018

Time: TBD

Courtroom: 13A

Judge: Hon. Dana Sabraw

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Spencer E. Amdur (SBN 320069)
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1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that a hearing date of April 27, 2018 has been set
3 in Courtroom 13A before the Hon. Judge Dana Sabraw for Plaintiffs-Petitioners'
4 motion for an order to grant certification of the proposed class defined as follows:
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6 All adult parents nationwide who (1) are or will be detained in immigration
7 custody by the Department of Homeland Security, and (2) have a minor child
8 who is or will be separated from them by DHS and detained in ORR custody,
9 absent a demonstration in a hearing that the parent is unfit or presents a
danger to the child.

10 Plaintiffs-Petitioners' Motion for Class Certification is based on this Notice
11 of Motion and Motion for Class Certification; the concurrently-filed Memorandum
12 in Support of Plaintiff-Petitioners' Motion for Class Certification; the Declaration
13 of Bardis Vakili in Support of Plaintiffs-Petitioners' Motion for Class Certification
14 and exhibits attached thereto; all papers, pleadings, records, and files in this case;
15 all matters of which judicial notice may be taken; and such other arguments and/or
16 evidence as may be presented to this Court at a hearing on this Motion.
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20 Dated: March 9, 2018

Respectfully Submitted,

21
22 Bardis Vakili (SBN 247783)
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/s/Lee Gelernt
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