UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

Georgia Latino Alliance for Human Rights, et al.,)))	
Plaintiffs,)) (Cose No. 1-11	ov 01904 TW/T
v.) Case No. 1:11	-cv-01804-TWT
Governor Nathan Deal, et al.,)	
Defendants.)	
)	

MOTION FOR EXPEDITED CONSIDERATION

Pursuant to LR 65.2, NDGa., Plaintiffs respectfully move the Court for expedited consideration of the Motion for Preliminary Injunction (ECF No. 29) and expedited scheduling of a hearing on this Motion. In support thereof, Plaintiffs state as follows:

Plaintiffs filed the complaint (ECF No. 1) in this matter on June 2, 2011, challenging Georgia's comprehensive immigration bill, House Bill 87 ("HB 87"), which was signed by Governor Deal on May 13, 2011 and is scheduled to take effect on July 1, 2011. Plaintiffs seek declaratory and injunctive relief to block Defendants' enforcement of this law. On June 8, 2011, Plaintiffs filed the instant Motion for Preliminary Injunction (ECF No. 29), alleging irreparable harm should

HB 87 be permitted to go into effect. Given the imminent enforcement date of the law and the significant constitutional issues raised in the complaint and motion, Plaintiffs seek expedited consideration of the motion, including expedited scheduling of a briefing schedule and hearing on the motion.

Counsel for Plaintiffs have been informed that the Senior Assistant Attorney General assigned to this case will be on leave from June 22-29, but is available to participate in a hearing on this matter the week of June 13-17, June 20, or June 21, 2011. Plaintiffs' counsel are available to participate in a hearing on any date in June.

Wherefore, Plaintiffs respectfully request that the Court grant the Motion for Expedited Consideration and set a briefing schedule and a hearing date on the Motion for Preliminary Injunction on a date convenient to the Court's calendar that allows consideration and resolution of the merits prior to July 1, 2011.

Dated: June 8, 2011 Respectfully submitted,¹

/s/ Michelle R. Lapointe

On behalf of Attorneys for Plaintiffs

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¹ Counsel certifies this document has been prepared in accordance with L.R. 5.1.

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^{*}Application for admission pro hac vice pending

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorney for Defendants Deal, Olens, Reese, and Beatty, to whom a copy is also being hand-delivered today:

Devon Orland
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40 Capitol Square, S.W.
Atlanta, GA 30334-1300
dorland@law.ga.gov
Attorney for Defendants Deal, Olens, Reese and Beatty

I hereby certify that a copy of the foregoing is being hand-delivered on this date to the following non-CM/ECF participant:

Falecia Stewart
Executive Director, Housing Authority of Fulton County
HAFC Headquarters
4273 Wendell Drive
Atlanta, GA 30336

This 8th day of June, 2011.

/s/ Michelle R. Lapointe