

unacceptable risk of wrongful removal, and for other reasons set forth in the accompanying Memorandum, the Rule violates the APA and the Immigration and Nationality Act. A preliminary injunction is warranted to prevent severe and irreparable harm to Plaintiffs.

In support of this Motion, Plaintiffs rely upon the accompanying Memorandum, declarations, and exhibits. A proposed order is attached for the Court's convenience.

PURSUANT TO LOCAL RULE 7(m)

Pursuant to Local Rule 7(m), on August 7, 8, and 9, Plaintiffs' counsel conferred with Erez Reuveni, Assistant Director, Office of Immigration Litigation, U.S. Department of Justice, to determine if Defendants would consent to the relief requested in this motion. Defendants informed Plaintiffs that they do not consent.

Dated: August 9, 2019

Respectfully submitted,

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**Pro hac vice application forthcoming*
***Pro hac vice application pending*
****Filing pursuant to LCvR 83.2(c)*
*****Application for admission forthcoming*
******Admitted pro hac vice*

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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2019, I electronically filed the foregoing motion, and accompanying memorandum of law and exhibits, with the United States District Court for the District of Columbia by using the CM/ECF system. In addition I emailed a courtesy copy of the foregoing motion, accompanying memorandum of law and exhibits, to Erez Reuveni, Assistant Director, United States Department of Justice-Civil Division at Erez.R.Reuveni@usdoj.gov. I will also be hand serving a copy of the same with the U.S. Attorney for the District of Columbia, on the next business day, at 555 4th St N.W., Washington D.C. 20530.

Date: August 9, 2018

/s/Celso Perez

Celso Perez