

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LILIAN PAHOLA CALDERON JIMENEZ)
and LUIS GORDILLO, et al.,)

Individually and on behalf of all others)
similarly situated,)

Plaintiff-Petitioners,)

v.)

KEVIN K. McALEENAN, et al.,)

Defendants-Respondents.)

No. 1:18-cv-10225-MLW

ORAL ARGUMENT REQUESTED

MOTION FOR ORDER TO SHOW CAUSE

As a consequence of the continued violations of the post-order custody regulations described in the accompanying Memorandum, Petitioners respectfully move for an order requiring Respondents to show cause why the Court should not order the release of detainees appearing on Respondents' July 12 detention report. Petitioners also respectfully request that the Court preserve its jurisdiction over these matters by requiring the government to either release the individuals in question or detain them within the jurisdiction of the Boston Enforcement and Removal Operations (Boston ERO) until the issues in this motion are resolved.

Respectfully submitted this 25th day of July, 2019.

/s/ Kevin S. Prussia

Matthew R. Segal (BBO # 654489)
Adriana Lafaille (BBO # 680210)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS, INC.
211 Congress Street
Boston, MA 02110
(617) 482-3170

Kathleen M. Gillespie (BBO # 661315)
Attorney at Law
6 White Pine Lane
Lexington, MA 02421
(339) 970-9283

Kevin S. Prussia (BBO # 666813)
Michaela P. Sewall (BBO # 683182)
Shirley X. Li Cantin (BBO # 675377)
Jonathan Cox (BBO # 687810)
Colleen M. McCullough (BBO # 696455)
Matthew W. Costello (BBO # 696384)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
kevin.prussia@wilmerhale.com
michaela.sewall@wilmerhale.com
shirley.cantin@wilmerhale.com
jonathan.cox@wilmerhale.com
colleen.mccullough@wilmerhale.com
matthew.costello@wilmerhale.com

Attorneys for Petitioners

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I certify that, in accordance with Local Rule 7.1(a)(2), counsel for Petitioners conferred with counsel for Respondents on July 25, 2019 in an attempt to resolve the issues raised in this motion. The parties were unable to reach a resolution.

/s/ Michaela P. Sewall
Michaela P. Sewall

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2019, a true copy of the foregoing will be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF).

/s/ Kevin S. Prussia
Kevin S. Prussia

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[PROPOSED] ORDER

WOLF, D.J.

_____, 2019

As requested in Petitioners’ July 25, 2019 Motion for Order to Show Cause, it is hereby ORDERED that: No later than _____, 2019, Respondents shall show cause why this Court should not order the release of the individuals identified in Respondents’ July 12 detention report and discussed in Petitioners’ July 25 memorandum of law. If the noncitizens in question are not released prior to the adjudication of this matter, Respondents shall detain them within the jurisdiction of the Boston Enforcement and Removal Operations (“Boston ERO”).

UNITED STATES DISTRICT JUDGE