

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
MAUDY ROMELI CONSTANZA LEMUS,)	
et al.)	
Plaintiffs,)	Civ. No. 20-10009
)	
v.)	
)	
CHAD F. WOLF, et al.)	
)	
Defendants.)	
_____)	

PLAINTIFFS’ MOTION TO EXPEDITE PROCEEDINGS

Pursuant to Rule 16 of the Federal Rules of Civil Procedure and L.R. 16.1, Plaintiffs Maudy Romeli Constanza Lemus, H.E.M.C. and Hanz Minoldo Morales Barrera hereby move to expedite proceedings with respect to Plaintiffs’ Motion for a Preliminary Injunction. This matter involves an immediate and significant dispute concerning the forced exile in Mexico of Plaintiffs Mr. Morales and H.E.M.C. under the government’s implementation of a program it calls the “Migrant Protection Protocols (“MPP”).

In support of their motion, Plaintiffs state as follows.

1. Plaintiffs commenced this action on January 3, 2020 seeking a declaration that the MPP and its non-refoulement procedures are unlawful and that Mr. Morales’s and H.E.M.C.’s inclusion in MPP was unlawful.

2. On the next business day after filing the complaint, Plaintiffs contacted government counsel in order to confer about the possibility of an agreed-to resolution of their claims. Plaintiffs learned on January 14, 2020 that the government would not agree to the relief requested.

3. Plaintiffs have thus moved for a Preliminary Injunction enjoining Defendants from continuing to apply MPP to Plaintiffs Mr. Morales and H.E.M.C.

4. Time is of the essence. Plaintiffs seek to expedite the proceedings concerning Plaintiffs' Motion for Preliminary Injunction because Mr. Morales's and H.E.M.C.'s lives and well-being are endangered each day that they are forced to remain in Mexico.

5. Plaintiffs propose the following briefing schedule and hearing date:

Plaintiffs' initial brief January 22, 2020

Defendants' opposition brief January 30, 2020

Plaintiffs' reply brief February 3, 2020

This schedule would permit the Court to hear the matter during the week of February 3, 2020 or at its earliest convenience thereafter.

CONCLUSION

For the reasons set forth above, Plaintiffs respectfully move this Court to expedite the proceedings concerning Plaintiffs' Motion for Preliminary Injunction and adopt the briefing and hearing schedule proposed herein.

Respectfully submitted,

MAUDY ROMELI CONSTANZA LEMUS,
H.E.M.C. AND
HANZ MINOLDO MORALES BARRERA,

By their attorneys,

/s/ Jessica S. Dormitzer

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Dated: January 22, 2020

LOCAL RULE 7.1 CERTIFICATE

Plaintiffs have conferred with Defendants in a good faith attempt to narrow or resolve the issues in dispute. Defendants do not agree to any expedited briefing schedule.

/s/ Jessica S. Dormitzer
Jessica S. Dormitzer

CERTIFICATE OF SERVICE

I hereby certify that this document will be served on all registered parties through the court's CM/ECF system.

/s/ Jessica S. Dormitzer
Jessica S. Dormitzer