

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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MAUDY ROMELI CONSTANZA LEMUS,		)	
et al.		)	
Plaintiffs,		)	Civ. No. 20-10009
		)	
v.		)	
		)	<b>ORAL ARGUMENT</b>
CHAD F. WOLF, et al.		)	<b>REQUESTED</b>
		)	
Defendants.		)	
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**PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Maudy Romeli Constanza Lemus, H.E.M.C. and Hanz Minoldo Morales Barrera move for a preliminary injunction enjoining Defendants from continuing to apply the so-called Migrant Protection Protocols to Mr. Morales and H.E.M.C., or, at a minimum, requiring the government to provide them with a fear assessment procedure that comports with applicable law.

As grounds for this Motion, Plaintiffs state that they are likely to succeed on the merits of the claims set forth in the Complaint filed on January 3, 2020. In addition, Plaintiffs will be irreparably harmed if the requested injunction is not issued; the balance of the equities weighs in favor of Plaintiffs; and the public interest weighs in favor of granting the injunction.

WHEREFORE, Plaintiffs respectfully pray that this Motion be allowed and that the Court enter a preliminary injunction, after notice and hearing on such expedited schedule as set forth in Plaintiffs’ Motion to Expedite Proceedings, or as the Court deems appropriate.

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 the relief requested.

/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