

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ANDRÉS OSWALDO BOLLAT VASQUEZ, et  
al.,

Plaintiffs,

v.

CHAD F. WOLF, et al.,

Defendants.

No. 20-cv-10566-IT

**PLAINTIFFS' SECOND MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs move for a preliminary injunction enjoining Defendants from continuing to apply the “Migrant Protection Protocols” to Nora Idalia Alvarado Reyes, Hermes Arnulfo López Merino, María de la Cruz Abarca de López, T.L., D.L., A.L., and Miriam Yanett Zuniga Posadas, and ordering that these Plaintiffs be parolled into the United States pending their immigration removal proceedings. At a minimum, Plaintiffs seek an order requiring the government to provide them with a fear assessment procedure that comports with applicable law. The parties are not seeking argument on this motion.

As grounds for this Motion, Plaintiffs state that they are likely to succeed on the merits of the claims set forth in the Amended Complaint filed on December 22, 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.

Dated: December 25, 2020

Respectfully submitted,

/s/ Adam J. Kessel

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### **LOCAL RULE 7.1 CERTIFICATION**

I, Adam J. Kessel, counsel for the Plaintiffs, hereby certify that I have conferred with counsel for Defendants in a good faith attempt to narrow or resolve the issues in dispute.

Defendants oppose the relief requested.

/s/ Adam J. Kessel

Adam J. Kessel