

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DOMINGO ARREGUIN GOMEZ, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States of America, et al.,

Defendants.

Civil Action No. 1:20-cv-01419

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs respectfully move this Court for an order preliminarily enjoining Defendants from enforcing Presidential Proclamation No. 10014, 85 Fed. Reg. 23,441 (Apr. 22, 2020) (First Amended Complaint (FAC) Ex. A) (the “April Proclamation”), and Presidential Proclamation No. 10052, 85 Fed. Reg. 38263 (June 22, 2020) (as amended) (FAC Ex. C) (the “June Proclamation,” and together with April Proclamation, the “Proclamations”). In the alternative, Plaintiffs respectfully request an order requiring the State Department to reserve unused diversity visa numbers for fiscal year 2020, so that visas may be granted upon a determination that the Proclamations are unlawful. *See P.K. v. Tillerson*, 302 F. Supp. 3d 1, 8-10 (D.D.C. 2017).

Pursuant to Local Civil Rule 65.1(d), Plaintiffs respectfully request that the Court hold a hearing on this motion within 21 days of its filing. Plaintiffs further respectfully request that the Court decide this motion as expeditiously as possible, but **not later than August 31, 2020**. The facts making expedition essential are detailed in the accompanying memorandum and declarations, but may be summarized as follows: The Proclamations prohibit entry into the United States of (among others) immigrants seeking to become permanent residents. The State Department has implemented these entry suspensions by refusing to issue visas. Among the plaintiffs are six winners of the 2020 Diversity Visa Lottery, who are now eligible to obtain immigrant visas. By

statute, however, these plaintiffs (and the class members whom they seek to represent) must receive their visas by the end of the 2020 fiscal year on September 30, 2020. There is no provision for extending that deadline. Should these plaintiffs and class members fail to obtain their visas by that date, they will lose the opportunity to immigrate to this country. An expedited decision is therefore essential to ensure that the relief is effective for these Plaintiffs.

Pursuant to Local Civil Rule 7(m), Plaintiffs' counsel have conferred with counsel for Defendants. Defendants oppose the motion.

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