

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LIA DEVITRI, et al.,

Petitioners/Plaintiffs,

v.

CHRIS M. CRONEN, et al.,

Respondents/Defendants.

Civil Action No.17-cv-11842-PBS

RENEWED EMERGENCY MOTION FOR CLARIFICATION OF COURT'S ORDER

Pursuant to the Court's Amended Order of September 27, 2017 [Dkt. No. 21],

Petitioners/Plaintiffs respectfully renew their request for emergency clarification that the individuals set forth in the table below, newly added as named Petitioners/Plaintiffs in this action, are subject to the same injunctive relief as ordered in the Court's Amended Order of September 26, 2017 [Dkt. No. 17].

The Court's September 27, 2017 Amended Order [Dkt. No. 21] denied Petitioners'/Plaintiffs' previous emergency motion for clarification [Dkt. No. 18], which sought to extend temporary injunctive relief to class members who were not named Petitioners/Plaintiffs. That Order further provided that the motion was "[d]enied without prejudice to filing an amended complaint with allegations specific to each plaintiff/putative class member. Alternatively, plaintiffs may confer with the government to negotiate a stand-still with respect to all participants in 'Operation Indonesian Surrender.'"

In the morning of September 28, 2017, counsel for Petitioners/Plaintiffs sent a proposal for a stand-still agreement to counsel for the Respondents/Defendants. No response has yet been received. In the meantime, Petitioners/Plaintiffs have filed a First Amended Class

9/29/17 Allowed. The stay applies to the newly added plaintiffs.
Paul S. Janus

Petition/Complaint [Dkt. No. 22], which adds allegations specific to each of the individuals listed in the table set forth below. This list of individuals does not cover all remaining members of the putative class, but, upon information and belief, does cover all putative class members with imminent removal dates within the next two weeks.

WHEREFORE, Petitioners/Plaintiffs respectfully request that this Court clarify that the following individuals, all of whom are now named Petitioners/Plaintiffs and all of whom have imminent departure dates as set forth below, are subject to the same injunctive relief as ordered in the Court's Amended Order of September 26, 2017 [Dkt. No. 17]:

Name	Scheduled Departure Date
ANTOUW, Roy	October 7, 2017
WALANDOW, Debby	October 7, 2017
BUDIARDJO, Arnold	October 4, 2017
BUDIARDJO, Virake	October 4, 2017
EMAN, Michael	October 5, 2017
MAMBO, Greace	October 5, 2017
MAMBO, Sonny	October 5, 2017
PANJAITAN, Eddy	October 7, 2017
PENTURY, Christian	October 11, 2017
RIMPER, Hesti	November 6, 2017
SINAGA, Linaria	October 7, 2017

Respectfully Submitted,

PETITIONERS/PLAINTIFFS

By Their Attorneys,

/s/ W. Daniel Deane

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