

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ANGELICA REBECA GONZALEZ-GARCIA, et al.,

Plaintiffs,

v.

JEFFERSON BEAUREGARD SESSIONS III, et al.,

Defendants.

Civil Action No. _____

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Plaintiffs seek a Temporary Restraining Order (“TRO”) and Preliminary Injunction under Fed. R. Civ. P. 65 that bars Defendants from continuing to detain Plaintiff S.K. on impermissible grounds. If the Court requires additional argument beyond the materials submitted in support of this Motion, Plaintiffs also respectfully request the Court schedule a hearing on or before June 29, 2018.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant this Emergency Motion for Temporary Restraining Order releasing Plaintiff S.K. to the custody of Plaintiff Gonzalez-Garcia;
- B. Enter the Proposed Order; and
- C. Grant such other and further relief as justice may require.

Respectfully Submitted,

PLAINTIFFS ANGELICA REBECA
GONZALEZ-GARCIA and her daughter, S.K., by
and through her mother, ANGELICA REBECA
GONZALEZ-GARCIA,

By their Attorneys,

/s/ Ronaldo Rauseo-Ricupero
Ronaldo Rauseo-Ricupero (BBO# 670014)
Julia A.C. Lippman (BBO# 688852)
NIXON PEABODY LLP
100 Summer Street
Boston, MA 02110
(617) 345-1000
rrauseoricupero@nixonpeabody.com
jlippman@nixonpeabody.com

Susan B. Church (BBO# 639306)
Heather Yountz (BBO# 669770)
Demissie & Church
929 Massachusetts Ave., Suite 01
Cambridge, MA 02139
(617) 319-2399
sbc@demissiechurch.com

Of counsel:
Matthew R. Segal (BBO# 654489)
Adriana Lafaille (BBO# 680210)
American Civil Liberties Union Foundation of
Massachusetts, Inc.
211 Congress Street
Boston, MA 02110
(617) 482-3170
alafaille@aclum.org

June 27, 2018

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that Counsel for Plaintiffs conferred with counsel for Defendants in good faith and attempted to resolve or narrow the issues, but were unable to reach agreement.

/s/ Ronaldo Rauseo-Ricupero

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 27, 2018, and will be transmitted by electronic mail to the Office of the United States Attorney for the District of Massachusetts.

/s/ Ronaldo Rauseo-Ricupero