1 2 3 4 5 6 7 8 9 10	CENTER FOR HUMAN RIGHTS & CONSTIT Carlos R. Holguín (Cal. Bar No. 90754) 256 South Occidental Boulevard Los Angeles, CA 90057 Telephone: (213) 388-8693 Email: crholguin@centerforhumanright NATIONAL CENTER FOR YOUTH LAW Leecia Welch (Cal. Bar No. 208741) Neha Desai (Cal. RLSA No. 803161) Mishan Wroe (Cal. Bar No. 299296) Melissa Adamson (Cal. Bar No. 319201) Diane de Gramont (Cal. Bar No. 324360) 1212 Broadway, Suite 600 Oakland, CAT Telephone: (510) 835-8098 Email: lwelch@youthlaw.org	s.email
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13	UNITED STATES DISTRICT COURT	
14	CENTRAL DISTRICT OF CALIFORNIA	
15	WESTERN DIVISION	
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17 18	JENNY LISETTE FLORES, et al.,	No. CV 85-4544-DMG-AGRx
19 20	Plaintiffs,	NOTICE OF MOTION AND MOTION TO ENFORCE SETTLEMENT RE EMERGENCY INTAKE SITES
21 22	MERRICK GARLAND, Attorney General the United States, et al.,	Hearing: Sept. 10, 2021 Time: 9:30 a.m. Hon. Dolly M. Gee
2324	Defendants.	J
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1 To Defendants and their attorneys of record: 2 Please take notice that on September 10, 2021, at 9:30 a.m. or as soon 3 thereafter as counsel may be heard, Plaintiffs will and do hereby move the Court 4 for a class-wide order requiring Defendants to cure breaches of the settlement 5 approved by this Court on January 28, 1997 ("Settlement"), as described in the 6 accompanying memorandum of law. 7 This motion is based upon the memorandum of law and exhibits filed 8 concurrently hereiwth, and all other matters of record; it is brought following 9 several meetings of counsel pursuant to Local Rule 7-3 and ¶ 37 of the Settlement, 10 most recently on July 30, 2021. 11 12 Dated: August 9, 2021 CENTER FOR HUMAN RIGHTS AND 13 CONSTITUTIONAL LAW Carlos R. Holguín 14 15 NATIONAL CENTER FOR YOUTH LAW Leecia Welch 16 Neha Desai 17 Mishan Wroe Melissa Adamson 18 Diane de Gramont 19 20 /s/ Leecia Welch 21 Leecia Welch One of the Attorneys for Plaintiffs 22 23 24 25 26 27 28