

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW  
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*Listing continues on next page*

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, Attorney General  
the United States, *et al.*,

Defendants.

No. CV 85-4544-DMG-AGR<sub>x</sub>

NOTICE OF MOTION AND MOTION FOR  
AWARD OF ATTORNEYS' FEES AND COSTS

Hearing: November 11, 2022

Time: 9:30 a.m.

Hon. Dolly M. Gee

1 NATIONAL CENTER FOR YOUTH LAW  
2 Neha Desai (Cal. RLSA No. 803161)  
3 Mishan Wroe (Cal. Bar No. 299296)  
4 Melissa Adamson (Cal. Bar No. 319201)  
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9 CHILDREN'S RIGHTS  
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14 *Attorneys for Plaintiffs*  
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1 PLEASE TAKE NOTICE that on November 11, 2022, at 9:30 a.m., or as  
2 soon thereafter as counsel may be heard, Plaintiffs will and do hereby move the  
3 Court for an award of attorneys' fees and costs under the Equal Access to Justice  
4 Act, 28 U.S.C. § 2412(d) ("EAJA"), for fees incurred in compelling Defendants to  
5 comply with the *Flores* Settlement and create enforceable standards at Emergency  
6 Intake Sites.

7 Plaintiffs allege that (1) they are the prevailing party; (2) the position of  
8 Defendants, both before and throughout this litigation, was without substantial  
9 justification; and (3) no special circumstances make an award of fees unjust. The  
10 motion is based on the annexed Memorandum of Points and Authorities, Plaintiffs'  
11 itemized statements and other supporting exhibits filed concurrently herewith, and  
12 the record of proceedings in this case.

13 Pursuant to Local Rule 7-3, Plaintiffs sent Defendants their fee request on  
14 August 22, 2022 and the parties met and conferred on August 24, 2022.

15  
16 Dated: August 29, 2022

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CONSTITUTIONAL LAW  
Carlos R. Holguín

19 NATIONAL CENTER FOR YOUTH LAW  
20 Neha Desai  
21 Melissa Adamson  
22 Mishan Wroe  
Diane de Gramont

23 CHILDREN'S RIGHTS  
24 Leecia Welch

25 /s/ Mishan Wroe

26 Mishan Wroe

27 *One of the Attorneys for Plaintiffs*  
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