

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW  
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*Attorneys for Plaintiffs*

*Additional counsel listed on following page*

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  
TO ENFORCE SETTLEMENT RE  
OPEN-AIR DETENTION SITES

Hearing: March 29, 2024

Time: 9:30 a.m.

Hon. Dolly M. Gee

1 NATIONAL CENTER FOR YOUTH LAW

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1 To Defendants and their attorneys of record:

2 Please take notice that on March 29, 2024, at 9:30 a.m., or as soon thereafter  
3 as counsel may be heard, Plaintiffs will and do hereby move the Court for a class-  
4 wide order requiring Defendants to cure breaches of the settlement approved by  
5 this Court on January 28, 1997 (“Settlement”), as described in the accompanying  
6 memorandum of law.

7 This motion is based upon the memorandum of law and exhibits filed  
8 concurrently herewith, and all other matters of record; it is brought following a  
9 meeting of counsel pursuant to Local Rule 7-3 and Paragraph 37 of the Settlement  
10 on January 4, 2024.

11  
12  
13 Dated: February 29, 2024

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14 Carlos R. Holguín  
15 Sarah Kahn

16 NATIONAL CENTER FOR YOUTH LAW

17 Mishan Wroe  
18 Diane de Gramont

19 CHILDREN’S RIGHTS

20 Leecia Welch

21 /s/ Mishan Wroe

22 Mishan Wroe

23 *One of the Attorneys for Plaintiffs*