

CURTIS LEE MORRISON (CSBN 321106)
RED EAGLE LAW, L.C.
30211 Avienda De Las Banderas
Suite 200 #7325
Rancho Santa Margarita, CA 92688
Phone: 714-661-3446
Email: curtis@redeaglelaw.com
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TOKTAM HOSSEINNEZHAD)	
ARIANI, <i>et al.</i> ,)	Civil No.: 2:24-cv-4536-FWS-DFM
)	
<i>Plaintiffs,</i>)	PLAINTIFFS' MOTION FOR
v.)	PRELIMINARY INJUNCTION
)	
ANTONY J. BLINKEN, <i>in his</i>)	Hearing Date: December 19, 2024
<i>official capacity as U.S. Secretary</i>)	Hearing Time: 10:00 AM
<i>of State, et al.</i> ,)	Courtroom 10D
)	Honorable Judge Fred W. Slaughter
<i>Defendants.</i>)	
)	

1 Plaintiffs hereby move this Court under Fed. R. Civ. P. 65(a) for Preliminary
2 Injunction declaring that Defendants' actions withholding and delaying the
3 adjudication and issuance of immigrant visas for Plaintiffs unlawful, mandate
4 Defendants fulfill their mandatory, non-discretionary duty to process Plaintiffs'
5 immigrant visa applications, fully adjudicate Plaintiffs' immigrant visa applications,
6 issue visas to eligible Plaintiffs.

7 Given the immediate and irreparable harm to Plaintiffs if the adjudication of
8 Plaintiffs' visa applications is not adjudicated by January 20, 2025, this Court should
9 issue an immediate order.

10 Pursuit to L.R. 7-3, on November 11, 2024, Plaintiffs, by counsel, conferred
11 with the opposing counsel regarding the upcoming motion via teleconference.
12 Defendants' counsel indicated they would oppose the motion at the said meeting.

13 Plaintiffs respectfully request that the Court grant this motion for the reasons
14 stated in the memorandum of law and supporting exhibits filed contemporaneously
15 with this motion.

16
17 Dated: November 20, 2024

Respectfully submitted,

18
19 /s/ Curtis Lee Morrison

20 Curtis Lee Morrison, Esq.

21 RED EAGLE LAW LC

22 30211 Avienda De Las Banderas

23 Suite 200 #7325

24 Rancho Santa Margarita, CA 92688

25 Phone: (714)661-3446

26 Email: curtis@redeaglelaw.com

27 *Attorney for Plaintiffs*
28

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2024, service of the foregoing **PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION** has been made on counsel of record through the Court's ECF system.

/s/ Curtis Lee Morrison

Curtis Lee Morrison (1631896)