UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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LAQUANA CAMPOS, on behalf of herself and her minor child, K.C.; TOSHA ADAMS; NORMAN MARSH; and BETTI RODNYANSKAYA, individually and on behalf of all persons similarly situated,

Plaintiffs.

Case No. 21-cy-05143

-against-

**NOTICE OF MOTION** 

KILOLO KIJAKAZI, Acting Commissioner of Social Security,

ORAL ARGUMENT REQUESTED

Detendant.	
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PLEASE TAKE NOTICE that upon the pleadings, including the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction and Provisional Class Certification, and declarations with exhibits in support thereof, Plaintiffs Laquana Campos, on behalf of herself and her minor child, K.C., Tosha Adams, Norman Marsh, and Betti Rodnyanksaya (together, "Plaintiffs"), will move this Court, before the Honorable Rachel Kovner, United States District Judge of the Eastern District of New York, United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on a date and time designated by the Court for oral argument, for an Order granting (a) Plaintiffs' motion for a preliminary injunction pursuant to Fed. R. Civ. P. 65(a); (b) Plaintiffs' motion for provisional certification of a class pursuant to Fed. R. Civ. P. 23(a) and (b)(2); and (c) granting such other and further relief as this Court deems just and proper.

Dated: October 26, 2021 New York, New York

By: <u>/s/ Sheila S. Boston</u>

Sheila S. Boston Carmela T. Romeo

Tyler J. Fink (pro hac vice to be filed)

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JUSTICE IN AGING

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