

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ANNALINDA MARTINEZ, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

GEORGIA DIVISION OF FAMILY AND
CHILDREN SERVICES; GEORGIA
DIVISION OF CHILD SUPPORT
SERVICES; GEORGIA DEPARTMENT
OF HUMAN SERVICES; CANDICE L.
BROCE, in her official capacity as
DIRECTOR OF THE DIVISION OF
FAMILY AND CHILDREN SERVICES;
CANDICE L. BROCE, in her official
capacity as COMMISSIONER OF THE
DEPARTMENT OF HUMAN SERVICES;
MELODY DeBUSSY, in her official
capacity as CHIEF POLICY OFFICER FOR
THE DEPARTMENT OF HUMAN
SERVICES; SARAH HURST, in her
official capacity as ASSISTANT DEPUTY
COMMISSIONER OF THE DIVISION
OF CHILD SUPPORT SERVICES

Defendants.

CASE No. 1:25-cv-04686-TRJ

**PLAINTIFF’S MOTION
FOR PRELIMINARY
INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Plaintiff hereby moves for a preliminary injunction to minimize irreparable harm while the Parties litigate the constitutionality and legality of Defendants’ challenged policies and practices. For the reasons set forth fully in Plaintiff’s Memorandum in support of this Motion,

Plaintiff specifically requests that this Court enter a preliminary injunctive order requiring Defendants to: (A) affirmatively modify or end support orders to account for children who have reached the age of majority, been adopted, or are otherwise no longer in foster care, (B) establish a simple and accessible procedure through which parents can notify Defendants of erroneous charges, (C) immediately correct erroneous charges upon notice from affected parents, and (D) cease enforcement mechanisms, including passport- and license-revocation while this litigation is pending.

Respectfully submitted,

/s/ Phil Telfeyan

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CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing using the CM/ECF system,
which will send notice of electronic filing to all counsel of record.

/s/ Phil Telfeyan
Phil Telfeyan