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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13 **EASTERN DIVISION**

14 Lazaro MALDONADO BAUTISTA, *et*
15 *al.*, on behalf of themselves and others
16 similarly situated,

17 *Plaintiffs-Petitioners,*

18 v.

19 Kristi NOEM, Secretary, Department of
20 Homeland Security; *et al.*,

21 *Defendants-Respondents.*

Case No. 5:25-cv-01873-SSS-BFM

**PLAINTIFFS-PETITIONERS’
MOTION TO ENFORCE
JUDGMENT**

Honorable Sunshine S. Sykes
United States District Judge

Hearing

Date: February 13, 2026
Time: 2:00 pm
Courtroom: N/A (via Zoom)
Judge: Sunshine S. Sykes

1 **INTRODUCTION**

2 Defendants-Respondents’ (Defendants) actions in this case irrefutably
3 demonstrate Defendants’ refusal to comply with this Court’s declaratory judgment
4 on behalf of the nationwide class. Chief Immigration Judge Teresa L. Riley’s
5 instruction to immigration judges (IJs) to ignore this Court’s judgment, as well as
6 Defendants’ responses filed to questions presented by this Court, affirm that
7 Defendants believe they may disregard this Court. *See* Dkt. 103. Defendants
8 maintain that IJs continue to be bound by the agency interpretation of the statute,
9 rather than this Court’s declaratory judgment regarding the proper authority
10 governing their detention. As such, Defendants are denying class members their
11 right to receive bond hearings under 8 U.S.C. § 1226(a). As a result, thousands of
12 class members remain unlawfully subjected to mandatory detention under
13 § 1225(b)(2)(A), denied of any opportunity to be released to return to their homes
14 and families. In addition, Defendants’ failure to abide by the declaratory judgment
15 requires federal district courts around the country to continue to expend significant
16 resources adjudicating habeas petitions and motions for temporary restraining orders
17 challenging Defendants’ actions that defy this Court’s ruling.

18 Accordingly, Plaintiffs file the instant motion based on the Court’s final
19 judgment granting declaratory relief on behalf of the certified class.

20 **ARGUMENT**

21 **I. The Court Has Jurisdiction to Issue Further Relief.**

22 As an initial matter, 28 U.S.C. § 2202 empowers this Court to issue further
23 relief. That section provides that “[f]urther necessary or proper relief based on a
24 declaratory judgment or decree may be granted, after reasonable notice and hearing,
25 against any adverse party whose rights have been determined by [a declaratory]
26 judgment [under § 2201].” 28 U.S.C. § 2202. This statute “merely carries out the
27 principle that every court, with few exceptions, has inherent power to enforce its

1 decrees and to make such orders as may be necessary to render them effective.” *Gant*
2 *v. Grand Lodge of Texas*, 12 F.3d 998, 1001 (10th Cir. 1993) (citation modified);
3 *see also Samuels v. Mackell*, 401 U.S. 66, 72 (1971). (“[T]he Declaratory Judgment
4 Act provides that after a declaratory judgment is issued the district court may enforce
5 it by granting further necessary or proper relief.” (citation modified)); *Desert*
6 *Outdoor Advert., Inc. v. City of Oakland*, No. C 03-01078 SI, 2009 WL 943948, at
7 *3 (N.D. Cal. Apr. 7, 2009) (“Section 2202 provides that federal courts have inherent
8 power to enforce their decrees and make orders necessary to render them
9 effective.”). As such, “§ 2202 ‘clearly anticipate[s] ancillary or subsequent coercion
10 to make an original declaratory judgment effective.” *Rodriguez Vazquez v.*
11 *Hermosillo*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ---, 2026 WL 102461, at *4
12 (W.D. Wash. Jan. 14, 2026) (alteration in original) (quoting *Horn & Hardart Co. v.*
13 *Nat’l Rail Passenger Corp.*, 843 F.2d 546, 548 (D.C. Cir. 1988)).

14 In addition, this Court has the “the authority to enforce its orders while an
15 appeal is pending.” *Nat’l Grange of the Ord. of Patrons of Husbandry v. California*
16 *State Grange*, 182 F. Supp. 3d 1065, 1074 (E.D. Cal. 2016) (citing *Sekaquaptewa v.*
17 *MacDonald*, 544 F.2d 396, 406 (9th Cir.1976)); *see also In re Padilla*, 222 F.3d
18 1184, 1190 (9th Cir. 2000) (“Absent a stay . . . , the trial court also retains jurisdiction
19 to implement or enforce the judgment or order but may not alter or expand upon the
20 judgment.”). These principles demonstrate that, notwithstanding Defendants’ notice
21 of appeal, this Court has jurisdiction to use § 2202 and its inherent power to grant
22 further necessary relief while Defendants’ appeal is pending.

23 **II. The Proposed Relief is Necessary and Proper.**

24 **a. Defendants are not abiding by the declaratory judgment despite**
25 **lacking any basis to do so.**

26 On January 13, 2026, Chief Immigration Judge Riley issued national guidance
27 to all Assistant Chief IJs, instructing them to in turn inform all IJs that “*Maldonado-*

1 *Bautista* is not a nationwide injunction and does not purport to vacate, stay or enjoin
2 *Yajure Hurtado*. Therefore, *Yajure Hurtado* remains binding on agency
3 adjudicators.” See Ex. A. Accordingly, IJs across the country continue to deny class
4 members bond based on § 1225(b)(2)(A), defying this Court’s judgment and
5 asserting that they are instead bound by the agency’s interpretation of the relevant
6 detention statutes. The result is that Defendants have forced upon this Court and
7 hundreds of other district judges across the country a continued flood of habeas
8 petitions from class members because Defendants refuse to provide the bond
9 hearings this Court declared required by law. See Dkt. 94.

10 To justify this position, Defendants have argued before this Court that a
11 declaratory judgment is merely “persuasive, but not coercive.” Ex. B, Jan. 22, 2026,
12 Hr’g Tr. 10:21. That, of course, is incorrect: longstanding Supreme Court caselaw
13 refutes this position, as the Declaratory Judgment Act is not a “medium for securing
14 an advisory opinion in a controversy which has not arisen.” *Coffman v. Breeze Corp.*,
15 323 U.S. 316, 324 (1945). Here there is plainly a significant and weight controversy.
16 Defendants’ attempt to minimize a judgment in a matter *in which they are a party* as
17 merely “persuasive” fundamentally misstates the law and seeks to undermine the
18 power of an Article III court. Ultimately, this sort of situation is precisely what
19 § 2202 was designed to address. The relief requested here is thus “necessary [and]
20 proper.” 28 U.S.C. § 2202.

21 Nor are Defendants correct that the judgment has no effect here because it is
22 declaratory. See Dkt. 103 at 1–2, 4. That argument is contrary to the bedrock
23 principle of Article III: that it “is emphatically the province and duty of the judicial
24 department to say what the law is.” *Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 177
25 (1803). Thus, “[w]hen the meaning of a statute [is] at issue, the judicial role [is] to
26 ‘interpret the act of Congress, in order to ascertain the rights of the parties.’” *Loper*
27 *Bright Enters. v. Raimondo*, 603 U.S. 369, 385 (2024) (quoting *Decatur v. Paulding*,

1 39 U.S. (14 Pet.) 497, 515 (1840)).

2 That does not change when the judgment is declaratory: “a declaratory
3 judgment is a real judgment, not just a bit of friendly advice.” *Rodriguez Vazquez*,
4 2026 WL 102461, at *6 (quoting *Badger Cath., Inc. v. Walsh*, 620 F.3d 775, 782
5 (7th Cir. 2010)). Thus, final judgment here is “legally binding on the parties,”
6 *Owner-Operator Indep. Drivers Ass’n, Inc. v. Swift Transp. Co.*, 632 F.3d 1111,
7 1123 (9th Cir. 2011), consistent with the “basic proposition that all orders and
8 judgments of courts must be complied with promptly,” *Maness v. Meyers*, 419 U.S.
9 449, 458 (1975). “[G]overnment officials and departments” are therefore expected
10 to “comply with declaratory judgments.” *United Aeronautical Corp. v. United States*
11 *Air Force*, 80 F.4th 1017, 1031 (9th Cir. 2023).

12 **b. Defendants should provide notice to the class and class counsel**

13 Pursuant to Federal Rule of Civil Procedure 23(d)(1)(B) this Court has
14 authority to order Defendants to provide appropriate notice. In a related class action,
15 the federal district court for the District of Massachusetts issued a final declaratory
16 judgment on behalf of the certified class and then exercised its authority under Rule
17 23(d)(1)(B) to order the “government to give notice to all noncitizens whom the
18 government reasonably believes may be members of the class.” *Guerrero Orellana*
19 *v. Moniz*, ---F. Supp. 3d ----, 2025 WL 3687757, at *9 (D. Mass. Dec. 19, 2025); *see*
20 *also* Fed. R. Civ. P. 23(c)(2). In addition, this Court has authority pursuant to 28
21 U.S.C. § 2202 to order notice to provide “necessary [and] proper relief,” as the
22 federal district court for the Western District of Washington did in *Rodriguez*
23 *Vazquez*. *See* 2026 WL 102461, at *10 (ordering notice to detainees, along with
24 production of specified documents to detainees and class counsel).

25 In light of Defendants’ refusal to abide by the final judgment, notice under
26 Federal Rule of Procedure 23(c)(2) and (d)(1)(B) to class members and class counsel
27 is critical. Specifically, Plaintiffs ask this Court to require Defendants to provide the

1 following forms of notice:

- 2 1) Written notice of class members’ rights to seek bond under the final judgment.
3 ICE officers must provide such notice to potential class members in their best
4 language within 48 hours of the class member being detained for removal
5 proceedings. The form of notice must be approved by the Court.
- 6 2) Oral notice provided on the record to class members by IJs at the first master
7 calendar hearing where the class member appears before an IJ. The notice
8 should instruct the noncitizen that they are a class member and that, pursuant
9 to the final judgment, they are entitled to a bond hearing under 8 U.S.C.
10 § 1226(a).
- 11 3) Notice provided to class counsel on a weekly basis via a list of names and A-
12 numbers of class members who are currently detained, the date they were
13 detained, the place they are presently detained, ICE’s custody determination,
14 and information regarding any bond hearings requested by the class members
15 during that week, including, (a) results of the bond hearing (grant/denial, bond
16 amount set, and if denied, the basis for the denial); (b) the date of the bond
17 hearing; (c) the name of the Immigration Judge issuing the determination; and
18 (d) the name of the class member’s counsel or other advocate representing
19 them at their bond hearing, if any.
- 20 4) Notice provided to class counsel on a bi-weekly basis with a list of names and
21 A-numbers of all class members who have been released by DHS at each field
22 office, pursuant to Defendant DHS’s responsibility to make initial custody
23 determinations under 8 U.S.C. § 1226(a).

24 The Ninth Circuit has described the kind of reporting and notice requirements
25 requested here as “oversight [that] can be a proper exercise of the district court’s
26 discretion[,] because it helps ensure compliance with [a court order].” *Thomas v.*
27 *Cnty. of Los Angeles*, 978 F.2d 504, 510 (9th Cir. 1992) (citation modified). That is
especially true here, given Defendants’ open defiance of the declaratory judgment.
See Rodriguez Vazquez, 2026 WL 102461 at *6, 10 (ordering further relief under §
2202, including notice to detainees, after Defendants failed to abide by declaratory
judgment); *see also Barahona-Gomez v. Reno*, 167 F.3d 1228, 1237 (9th Cir. 1999)
(upholding notice requirement in class action that was necessary to “inform class
members that equitable relief may be available, and to ensure that the INS did not
mistakenly deport a class member”). Such requests are “narrowly tailored” to

1 address the specific harms Plaintiffs are experiencing by enabling them to pursue the
2 individual enforcement actions currently necessary to provide meaningful relief.
3 *Moreno Galvez v. Jaddou*, 52 F.4th 821, 835 (9th Cir. 2022) (citation omitted); *see*
4 *also Melendres v. Arpaio*, 784 F.3d 1254, 1267 (9th Cir. 2015) (affirming in large
5 part “narrowly tailored” orders designed to remedy specific compliance issues).

6 While class counsel is generally responsible for providing notice to class
7 members, it is well recognized that Defendants should bear that responsibility where
8 Defendants are “uniquely positioned to ascertain class membership.” *Barahona-*
9 *Gomez*, 167 F.3d at 1237. This is precisely the type of case in which the Ninth Circuit
10 has recognized that Defendants are best positioned to identify class members.
11 Defendants have arrested class members, placed them in a detention facility, and
12 maintain their immigration records. This makes Defendants “uniquely positioned to
13 ascertain class membership.” *Id.* Courts in this circuit and elsewhere have regularly
14 required Defendants to identify and provide notice to class members in similar
15 contexts. *See, e.g., Guerrero Orellana*, 2025 WL 3687757, at *9; *Rodriguez v.*
16 *Robbins*, 715 F.3d 1127, 1130–31 (9th Cir. 2013); *Al Otro Lado v. Wolf*, 497 F.
17 Supp. 3d 914, 932–34 (S.D. Cal. 2020), *aff’d in part, vacated in part sub nom. Al*
18 *Otro Lado v. Exec. Off. for Immigr. Rev.*, 138 F.4th 1102 (9th Cir. 2025); *cf.*
19 *Barahona-Gomez*, 167 F.3d at 1236–37 (affirming requirement that government
20 must provide notice to class members).

21 Defendants argue that notice is “optional” for a Rule 23(b)(2) class, Dkt. 103
22 at 5, but provide no explanation as to why notice should not be required. And given
23 Defendants’ open defiance of the Court’s final judgment, Plaintiffs submit notice is
24 clearly required, and certainly “necessary or proper.” 28 U.S.C. § 2202.

25 Defendants also argue that if notice is required, public posting of the notice is
26 sufficient. *Id.* at 6. However, as the district court in *Guerrero Orellana* concluded,
27 the mere posting of notices in detention facilities would be inadequate in light of

1 transfers, language barriers, and the fact that many class members are unrepresented.
2 *Guerrero Orellana*, 2025 WL 3687757, at *9. It would also defeat a key purpose of
3 notice, as it “would be so overinclusive as to be counterproductive to enforcing the
4 declaratory judgment.” *Rodriguez Vazquez*, 2026 WL 10246 at *7.

5 Written notice to class members is necessary or proper here for several
6 reasons. Defendants’ defiance of the declaratory judgment leaves most class
7 members without any avenue for relief, unless they somehow learn that Defendants
8 are infringing upon their rights. Even for those class members with legal
9 representation, many attorneys are unaware of the rapidly evolving legal landscape
10 regarding class members’ rights to bond hearings and are unaware that their clients
11 are entitled to a bond hearing, notwithstanding IJ pronouncements that their clients
12 are subject to mandatory detention.

13 Even worse, the majority of class members are likely pro se and have virtually
14 no means to know that their cases are subject to a declaratory judgment that entitles
15 them to consideration for release on bond, particularly when ICE or an IJ tells them
16 otherwise. Without notification about their rights, pro se class members are unlikely
17 to be able to complete a bond hearing and file a habeas petition to assert their rights.
18 Providing class counsel a class list and notifying class members of their rights will
19 provide a small step toward ameliorating the harm Defendants inflict on class
20 members by ignoring their rights and leaving them to languish in unlawful detention.

21 Oral notice from IJs is also necessary or proper. Defendants have instructed
22 the IJs to violate the law, and those IJs are the ones who are actively misinforming
23 class members that they are subject to mandatory detention under § 1225(b)(2)(A)
24 and ineligible for bond hearings under § 1226(a). Requiring IJs to inform class
25 members at their first master calendar hearing that a district court has determined
26 that class members are in fact eligible for bond hearings will ameliorate this obvious
27 imbalance of power and misinformation created by Defendants.

1 Finally, notice to class counsel is necessary in order for class counsel to
2 monitor Defendants’ compliance with the declaratory judgment, and to determine
3 what additional steps may be necessary to secure class members’ rights. Similarly,
4 notice with respect to DHS is necessary to ensure that Defendant DHS, and not only
5 Defendant EOIR, is complying with the declaratory judgment. This is because DHS
6 bears responsibility to make initial custody determinations for persons detained
7 subject to § 1226(a). *See* 8 U.S.C. § 1226(a); 8 C.F.R. § 236.1(d)(1). This Court also
8 vacated the DHS July 8, 2025, memorandum, “Interim Guidance Regarding
9 Detention Authority for Applicants for Admission,” and Defendants have
10 represented that they no longer rely on that memorandum, Dkt. 103 at 4, but
11 Plaintiffs have seen no evidence of Defendants exercising their discretionary
12 authority under § 1226(a) to release those they had misclassified under § 1225(b)(2).

13 In short, Plaintiffs’ proposed relief is necessary to ensure that persons know
14 their rights and have an adequate opportunity to seek relief from this Court.
15 Defendants will undoubtedly argue that it is unduly burdensome for them to provide
16 notice to class members. But “any burden on Defendants in furnishing notice is a
17 self-inflicted result of their noncompliance with the Court’s order.” *Rodriguez*
18 *Vazquez*, 2026 WL 102461, at *7.

19 **III. This Court Should Vacate *Matter of Yajure Hurtado*.**

20 In addressing Plaintiffs’ motion to reconsider and clarify, the Court denied
21 Plaintiffs’ request that the Court vacate the BIA decision in *Matter of Yajure*
22 *Hurtado*. *See* Dkt. 92 at 6. In doing so, the Court acknowledged that “the BIA issued
23 the decision in *Yajure Hurtado* weeks after Petitioners filed their Motion for Partial
24 Summary Judgment,” but nonetheless concluded that because Plaintiffs had not
25 amended their complaint to seek vacatur of the BIA decision, it would be improper
26 to grant vacatur at that stage of the proceedings. *Id.* at 5.

27 However, subsequent developments—specifically, Defendants’ refusal to

1 comply with the declaratory judgment—demonstrate it is now appropriate for the
2 Court to take such action pursuant to 28 U.S.C. § 2202; *see, e.g.*, Ex. C, at 3 (IJ order
3 denying bond on the theory that “in the absence of a ruling directing immigration
4 courts not to apply *Hurtado*, [IJs] must still apply *Hurtado*.”).

5 Courts have repeatedly affirmed that a party need not have requested specific
6 relief in their complaint to seek that relief in a § 2202 motion. *See, e.g., Edward B.*
7 *Marks Music Corp. v. Charles K. Harris Music Pub. Co.*, 255 F.2d 518, 522 (2d Cir.
8 1958) (“[T]he further relief sought—here monetary recompense—need not have
9 been demanded, or even proved, in the original action for declaratory relief. The
10 section authorizes further or new relief based on the declaratory judgment, and any
11 additional facts which might be necessary to support such relief can be proved on
12 the hearing provided in the section”); *Gant*, 12 F.3d at 1003 (“The broad grant
13 of authority provided by section 2202 permits the court to order relief even though
14 such relief might have been available at the time of the declaratory action. It
15 authorizes the court to grant relief that was not demanded or relief that was not even
16 proved in the original declaratory judgment action.” (citation modified)); *Com.*
17 *Union Ins. Co. v. Walbrook Ins. Co.*, 41 F.3d 764, 773 (1st Cir. 1994) (“Section 2202
18 gives effect to the cumulative nature of the declaratory device by authorizing a
19 district court to grant additional relief consistent with the underlying declaration
20 even though the right to the relief may arise long after the court has entered its
21 declaratory judgment.” (footnote omitted)); *Horn*, 843 F.2d at 549 n.7 (“Indeed, §
22 2202’s post-judgment relief need not be demanded, or even proved, in the original
23 action.”); *Ins. Servs. of Beaufort, Inc. v. Aetna Cas. & Sur. Co.*, 966 F.2d 847, 851
24 (4th Cir. 1992) (similar).

25 As this Court held, the Court has the authority to grant vacatur. Dkt. 93 at 20–
26 35. And vacatur is particularly warranted now—after the entry of the final
27 judgment—given that Defendants have relied on the Court’s prior decision not to

1 vacate *Yajure Hurtado* to justify their continuing defiance of this Court. *See* Dkt.
2 103 at 1; *see also* Ex. A. Accordingly, Plaintiffs respectfully submit that vacatur now
3 constitutes “necessary” or “proper relief . . . against any adverse party whose rights
4 have been determined by such [declaratory] judgment.” 28 U.S.C. § 2202.

5 **IV. Defendants Should be Provided an Opportunity to Withdraw their**
6 **Frivolous Representations to the Court.**

7 At every turn of this case, Defendants have obfuscated their legal obligations.
8 When this Court originally granted summary judgment and declaratory relief for the
9 class in November 2025, Defendants claimed that the lack of a final judgment under
10 Rule 54(b) absolved them from complying with the declaratory judgment. *See* Dkt.
11 90 at 2–4. Now, Defendants claim that this Court’s Rule 54(b) final judgment is not
12 binding and that the lack of vacatur or injunction against *Matter of Yajure Hurtado*
13 relieves IJs of complying with the law. *See* Dkt. 103 at 2–5. Defendants have not
14 cited any controlling authority for some of these assertions, including their claim
15 that a declaratory judgment is not binding and that *Yajure Hurtado* remains binding
16 on IJs, because, in part, a BIA decision controls over an Article III federal court’s
17 interpretation. Ex. B, Jan. 22, 2026, Hr’g Tr. at 18:4-10; Dkt. 103 at 2; *but see*
18 *Rodriguez Vazquez*, 2026 WL 102461, at *4 (“A contrary decision by the BIA—
19 which is party of the executive branch—does not override the binding judgment of
20 an Article III Court adjudicating an actual case or controversy between the parties.”).
21 They also claim to be “complying with the Court’s December 18, 2025 order,” Dkt.
22 103 at 3, even though IJs continue to deny class members bond hearings. As
23 Plaintiffs have explained, Defendants’ claims are inconsistent with settled law and
24 ongoing practice, and could be subject to Fed. R. Rule 11(c) if not withdrawn.

25 **CONCLUSION**

26 For the foregoing reasons, the Court should grant the relief as necessary and
27 proper in response to Defendants’ refusal to abide by the declaratory judgment.

1 Respectfully submitted this 28th day of January, 2026.

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/s/ Niels W. Frenzen

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CERTIFICATE OF COMPLIANCE

I, Niels Frenzen, certify that this brief contains 3,409 words and complies with the word limit of L.R. 11-6.1

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