

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

_____	)	
CLAYTON RICHARD GORDON and	)	
PRECIOSA ANTUNES, on behalf of	)	Civ. No. 3:13-cv-30146
themselves and others similarly situated,	)	
	)	
Plaintiff-Petitioners,	)	
	)	
v.	)	<b>ORAL ARGUMENT</b>
	)	<b>REQUESTED</b>
JANET NAPOLITANO, ET AL.,	)	
	)	
Defendant-Respondents.	)	
_____	)	

**MOTION FOR PRELIMINARY INJUNCTIVE RELIEF**

Plaintiff-Petitioners Clayton Richard Gordon and Preciosa Antunes (“Plaintiffs”) respectfully move to preliminarily enjoin immigration authorities from further detaining them unless they receive individual bond hearings.

Plaintiffs have simultaneously filed a Class Action Complaint and Petition for Writ of Habeas Corpus, alleging that they are improperly being subjected to mandatory immigration detention under 8 U.S.C. § 1226(c). As demonstrated in the attached Memorandum of Law, Plaintiffs are likely to succeed on the merits of their claim, and they and their families will suffer irreparable harm if their unlawful detention is not enjoined. Further, the balance of equities tips in their favor, and a preliminary injunction is in the public interest.

WHEREFORE, Plaintiffs respectfully ask that the Court grant this Motion and preliminarily enjoin the Defendant-Respondents from continuing to detain them unless they receive timely individualized bond hearings in accordance with 8 U.S.C. § 1226(a).

**REQUEST FOR ORAL ARGUMENT**

In accordance with Local Rule 7.1(d), counsel respectfully requests oral argument.

Respectfully submitted this 8th day of August, 2013.

/s/ Adriana Lafaille

Matthew R. Segal (BBO # 654489)

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/s/ Judy Rabinovitz

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forthcoming.

/s/ Elizabeth Badger

Elizabeth Badger (BBO # 663107)

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**Certificate of Service**

I, Adriana Lafaille, hereby certify that a true copy of the foregoing Motion for Preliminary Injunctive Relief was served on August 8, 2013, by certified U.S. mail, upon the following:

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Respectfully submitted,

/s/ Adriana Lafaille

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