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19 Attorneys for Plaintiffs
20 (For additional attorneys see next page)

21 UNITED STATES DISTRICT COURT
22 FOR THE CENTRAL DISTRICT OF CALIFORNIA

23 EL RESCATE LEGAL SERVICES,)
24 INC., et al.,)

25 Plaintiffs,)

26 v.)

27 EXECUTIVE OFFICE FOR)
28 IMMIGRATION REVIEW, et al.,)

Defendants.)

No. CV 88-1201 KN

PLAINTIFFS' REPLY MEMORANDUM
IN SUPPORT OF MOTION TO
VOLUNTARILY DISMISS ACTION

Date: November 29, 1993

Time: 9:30 a.m.

Judge David V. Kenyon

FILED

Nov 22 3 20 PM '93

1 Attorneys for Plaintiffs (continued)

2 VIBIANA ANDRADE
3 MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND
4 634 South Spring Street, 11th Floor
Los Angeles, CA 90014
(213) 629-2512

5 CARLA WOEHRLE
6 TALCOTT, LIGHTFOOT, VANDEVELDE, WOEHRLE & SADOWSKY
7 655 South Hope Street, 13th Floor
Los Angeles, CA 90017
(213) 622-4750

8 SHEILA K. NEVILLE
9 IMMIGRANTS' RIGHTS OFFICE
LEGAL AID FOUNDATION OF LOS ANGELES
10 1636 West Eighth Street, Suite 215
Los Angeles, CA 90017
(213) 487-6551

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1 In light of defendants' objections to plaintiffs' proposed
2 notice to the class, plaintiffs propose modifying the paragraph
3 to which defendants' object. Plaintiffs propose that the
4 paragraph read as follows:

5 Complete Interpretation

6 In 1992 the Immigration Courts in Los Angeles, San
7 Diego, and El Centro adopted a policy which requires
8 complete interpretation or summarization of everything
9 that is said during your immigration court hearing.

10 The testimony of all witnesses during your hearing
11 should be interpreted for your benefit. This applies
12 whether you have an attorney or whether you are
13 representing yourself.

14 If you are not represented by an attorney during
15 your hearing then any discussions between the judge and
16 the INS attorney must be interpreted. The judge's
17 decision must be interpreted. Any discussion of legal,
18 procedural, or other administrative matters must either
19 be interpreted or summarized for your benefit.

20 If you are represented by an attorney during your
21 hearing then any legal arguments or objections by your
22 attorney or by the INS attorney must be interpreted.

23 ///

24 ///

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26 ///

1 The judge's decision must be interpreted. Discussions
2 between the judge and your attorney or the INS attorney
3 must either be interpreted or summarized for your
4 benefit.

5
6 DATED: November 22, 1993

Respectfully submitted,

7 PUBLIC COUNSEL
8 SAN FERNANDO NEIGHBORHOOD
9 LEGAL SERVICES
10 NATIONAL IMMIGRATION LAW CENTER
11 MEXICAN AMERICAN LEGAL DEFENSE
12 AND EDUCATIONAL FUND
13 TALCOTT, LIGHTFOOT, VANDEVELDE,
14 WOEHRLE & SADOWSKY
15 IMMIGRANTS' RIGHTS OFFICE OF THE
16 LEGAL AID FOUNDATION OF LOS
17 ANGELES

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BY: 

NIELS W. FRENZEN

Attorneys for the Plaintiffs

1 PROOF OF SERVICE

2
3 State of California, County of Los Angeles.

4 I, Niels Frenzen, am a resident of the aforesaid county,
5 State of California; I am over the age of 18 years and not a
6 party to the within action; my business address is 3535 West
7 Sixth Street, Suite 100, Los Angeles, CA 90020.

8 On November 22, 1993, I served the foregoing

9 PLAINTIFFS' REPLY MEMORANDUM

10 on the defendants by placing a true and correct copy thereof,
11 enclosed in a sealed envelope, addressed as follows:

12 Allen Hausman
13 Office of Immigration Litigation
14 Civil Division
15 U.S. Department of Justice
16 601 D St., NW
17 Washington, DC 20044

18 I caused such envelope to be delivered via Federal Express
19 overnight courier from Los Angeles, California and to be sent
20 via facsimile.

21 I certify under penalty of perjury that the foregoing is
22 true and correct, and that I am employed in the office of a
23 member of the bar of this court at whose direction the service
24 was made. Executed on November 22, 1993.

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