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(Additional counsel listed on following page)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Housing Works, Los Angeles Catholic
Worker, Independent Living Center of
Southern California, Inc., and Timothy
Laraway,

Plaintiffs,

v.

County of Los Angeles, County of
Los Angeles Board of Supervisors, and Los
Angeles County Department of Public
Social Services,

Defendant.

Case No. 2:15-cv-08982 GW
(RAOx)

NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
INJUNCTION

Date: July 11, 2016
Time: 8:30 a.m.
Place: Courtroom 10, Before
The Hon. George H. Wu

1 Additional counsel:

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on Monday, July 11, 2016, at 8:30 a.m., or as soon thereafter as the matter may be heard, in Courtroom 10, United States District Court for the Central District of California, located at 312 North Spring Street, Los Angeles, California, Plaintiffs Housing Works and Independent Living Center of Southern California, Inc. will move the Court for an order that pending final resolution of this case, Defendants County of Los Angeles, County of Los Angeles Board of Supervisors, and Los Angeles County Department of Public Social Services (“DPSS”), their respective successors, agents, employees and those acting in concert therewith are prohibitively enjoined from:

(a) requiring persons with mental and/or cognitive disabilities to apply for General Relief in-person at DPSS offices without any consideration of their disabilities, and

(b) failing to make reasonable accommodations, such as U.S. mail, facsimile transmission, email, online and/or home visits, for persons with mental and/or cognitive disabilities so that they can apply for General Relief without having to go to the DPSS offices.

While motions for preliminary injunction are not subject to the requirements of L.R. 7-3, this motion is made following the conference of counsel which took place on May 25, 2016.

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1 This motion is based on this notice of motion, the accompanying
2 memorandum of points and authorities, the declarations, exhibits, request for
3 judicial notice and proposed order filed concurrently herewith in support of this
4 motion, the pleadings, records and papers on file with the Court, and such
5 additional evidence and argument as may be presented at the hearing on this
6 motion.

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8 DATED: June 9, 2016

Respectfully submitted,

9
10 LEGAL AID FOUNDATION OF
LOS ANGELES

11 By: /s/ Matthew G. Clark
12 Matthew G. Clark

13 WESTERN CENTER ON LAW
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15 By: /s/ Robert D. Newman
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24 DISABILITY RIGHTS LEGAL CENTER

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