

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL DAY LABORER ORGANIZING NETWORK; CENTER FOR CONSTITUTIONAL RIGHTS; and IMMIGRATION JUSTICE CLINIC OF THE BENJAMIN N. CARDOZO SCHOOL OF LAW,

Plaintiffs,

- against -

UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT AGENCY; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; FEDERAL BUREAU OF INVESTIGATION; and OFFICE OF LEGAL COUNSEL,

Defendants.

No. 10 Civ. 3488 (SAS)
ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Joseph N. Cordaro dated November 14, 2011; the Declaration of Ryan Law dated November 14, 2011, and the accompanying memorandum of law, defendant United States Immigration and Customs Enforcement, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, hereby move for (i) a stay of this Court's Opinion and Order dated October 24, 2011 (the "Order") pending the disposition of defendants' appeal from the Order to the United States Court of Appeals for the Second Circuit, and (ii) if this motion is denied, an interim stay of the Order pending defendants' motion for a stay pending appeal to the United States Court of Appeals for the Second Circuit pursuant to Federal Rule of Appellate Procedure 8(a)(2).

