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(For additional attorneys see next page)

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

EL RESCATE LEGAL SERVICES, )  
INC., et al., )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
EXECUTIVE OFFICE FOR )  
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

CLERK OF DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
*[Signature]*

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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.

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

DATED: November 22, 1993

Respectfully submitted,

PUBLIC COUNSEL  
SAN FERNANDO NEIGHBORHOOD  
LEGAL SERVICES  
NATIONAL IMMIGRATION LAW CENTER  
MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND  
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IMMIGRANTS' RIGHTS OFFICE OF THE  
LEGAL AID FOUNDATION OF LOS  
ANGELES

BY:   
NIELS W. FRENZEN  
Attorneys for the Plaintiffs

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**PROOF OF SERVICE**

State of California, County of Los Angeles.

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

On November 22, 1993, I served the foregoing

PLAINTIFFS' REPLY MEMORANDUM

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

Allen Hausman  
Office of Immigration Litigation  
Civil Division  
U.S. Department of Justice  
601 D St., NW  
Washington, DC 20044

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

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

  
\_\_\_\_\_  
NIELS W. FRENZEN