

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

GUILFORD COLLEGE, *et al.*,

Plaintiffs,

v.

KIRSTJEN NIELSEN, *et al.*,

Defendants.

Civil Action No. 18-cv-891

**PLAINTIFFS' MOTION TO EXPAND THE SCOPE OF THE
TEMPORARY RESTRAINING ORDER**

Relief respectfully requested before February 5, 2019

Pursuant to the Court's January 28, 2019 temporary restraining order (Dkt. No. 36) and its indication that the parties may request "to be heard further prior to the hearing on March 26, 2019" (*id.* at 2), Plaintiffs respectfully request that the Court amend the order to temporarily restrain Defendants from enforcing the August 9, 2018 Policy Memorandum in all its applications. For the reasons explained in the accompanying brief, Plaintiffs submit that this expanded relief is both appropriate and necessary under the circumstances. Plaintiffs respectfully request that the Court address this motion prior to February 5, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and have verified that such filing was sent electronically using the CM/ECF system to counsel for defendants.

Dated: January 29, 2019

/s/ Paul W. Hughes

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**[PROPOSED] ORDER EXPANDING THE SCOPE OF THE EXISTING
TEMPORARY RESTRAINING ORDER**

Before the Court is Plaintiffs' motion to expand the scope of the temporary restraining order that the Court issued on January 28, 2019. (ECF No. 36.) Having considered the parties' filings, the Court concludes that expanding the scope of the existing temporary restraining order is in the public interest and warranted to preserve the status quo and prevent irreparable harm until the Court rules on the merits of the currently pending motions.

IT IS THEREFORE ORDERED that Plaintiffs' motion to expand the scope of the temporary restraining order is granted.

IT IS FURTHER ORDERED that pending the resolution of the Motion for Preliminary Injunction and Motion to Dismiss, the Defendants are temporarily restrained from applying the August 9, 2018 Policy Memorandum in any respect, not limited to Plaintiffs Jia Ye and Sen Li.

This, the [XX] day of [January], 2019.

/s/ Loretta C. Biggs
United States District Judge