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A. COVID-19 Is a Global Pandemic that Poses a Significant Risk of Death or Serious Illness to Petitioners

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Coronavirus pandemic is accelerating as cases eclipse 350,000, WHO says

WHO Director-General's opening remarks at the media briefing on COVID-19 – 11 March 2020

Coronavirus disease 2019 (COVID-19) Situation Report – 73

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Georgia Department of Public Health COVID-19 Daily Status Report

Governor Kemp Issues Shelter in Place Order

Georgia Department of Public Health COVID-19 Daily Status Report

In hard-hit Georgia, virus expected to linger

State-by-state breakdown of 113 rural hospital closures,

‘It is a failing. Let’s admit,’ Fauci says of coronavirus testing capacity

Evaluating and Testing Persons for Coronavirus Disease 2019 (COVID-19)

How Many People in the United States Actually Have COVID-19?

Outbreaks in Migrant Detention Facilities

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Tuberculosis in prisons: anatomy of global neglect

Covid-19 Poses a Heightened Threat in jails and Prisons

Hall, Fulton counties releasing nonviolent offenders early as virus looms

Georgia jailers cope with COVID-19; release inmates, quarantine arrivals

Prioritization of Home Confinement As Appropriate in Response to COVID-19 Pandemic

ICE Guidance on COVID-19
ICE Guidance on COVID-19

ICE's COVID-19 test figures hint at health crisis in detention

C. Stewart and Irwin Detention Centers Are Primed for COVID-19 Exposure and Severe Outbreaks

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Id.

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Michael Robinson.

Peter Owusu.

Shehza Khan.

Ansumana Jammeh

Karen Lopez.

Shelley Dingus.

Kimberly Salazar.

Sonia Cabrera Benitez.

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U.S. Bureau of Prisons

Gomez v. United States

Gomez

available

Gayle v. Meade

see also Gomez

VII. CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Violation of Fifth Amendment Right to Substantive Due Process

Detention Constituting Unlawful Punishment

Tel:

Tel:
Fax:

admitted pro hac vice
pro hac vice motions forthcoming

Tel:
Fax: