

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

K.Y., a minor, et al.,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Case No. 24-cv-3056

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION
AND APPOINTMENT OF CLASS COUNSEL**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs respectfully move this Court for an order certifying a class as to all claims in this action, as defined as follows:

Youth who are currently or will be (1) committed to the custody of the D.C. Department of Youth Rehabilitation Services; (2) detained at the Youth Services Center; and (3) awaiting placement.

Plaintiffs further move this Court to certify K.Y., a minor, by and through his next friend Jane Doe; and D.J., a minor, by and through his next friend Jane Roe,¹ as class representatives.

Plaintiffs further move this Court to appoint Megan Yan, Hanna Perry, and Maya Chaudhuri from the Public Defender Service for the District of Columbia and Scott Michelman and Aditi Shah from the American Civil Liberties Union of the District of Columbia as class counsel.

Counsel for Defendants has not yet been assigned and therefore cannot be asked about Defendants' position on this Motion.

¹ A motion for each of the next friends to proceed under a pseudonym, in order to protect the privacy of the minor children, will be forthcoming.

An accompanying memorandum of law in support of this Motion is filed herewith.

Date: October 28, 2024

Respectfully submitted,

/s/ Megan Yan

Megan Yan, D.C. Bar No. 1735334
Hanna Perry, D.C. Bar No. 90003756
Maya Chaudhuri, D.C. Bar No. 1779875

PUBLIC DEFENDER SERVICE FOR THE
DISTRICT OF COLUMBIA
633 3rd Street N.W.
Washington D.C. 20001
(202)-824-2201
myan@pdsdc.org
hperry@pdsdc.org
mchaudhuri@pdsdc.org

Scott Michelman, D.C. Bar No. 1006945
Aditi Shah*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF THE DISTRICT OF COLUMBIA
529 14th Street NW Suite 722
Washington, D.C. 20045
(202) 457-0800
smichelman@acludc.org
ashah@acludc.org

Counsel for Plaintiffs

* Application for admission *pro hac vice*
forthcoming; application for admission to the
D.C. bar forthcoming; practice limited to
federal courts

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Class Certification and the accompanying Memorandum of Law in Support will be served on Defendants once summons issue.

/s/ Megan Yan
Megan Yan