

JOAQUIN ORELLANA CASTANEDA and
GERMAN HERNANDEZ ARGUETA, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

COUNTY of SUFFOLK; Steven Bellone, County
Executive, County of Suffolk, *in his official*
capacity; SUFFOLK COUNTY SHERIFF'S
OFFICE; Vincent F. DeMarco, Sheriff, Suffolk
County Sheriff's Office, *in his official capacity*; and
other individuals in charge to be identified,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying declaration of Aldo A. Badini, dated June 18, 2021, and the exhibits annexed thereto, declaration of Jose Perez, dated June 18, 2021, the declarations of Joaquin Orellana Castaneda and German Hernandez Argueta, the accompanying Memorandum of Law, and upon the pleadings and proceedings heretofore had herein, plaintiffs will move before The Honorable William F. Kuntz, II United States District Judge for the Eastern District of New York, for an Order: (i) certifying plaintiffs' proposed class pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure, and (ii) appointing Winston & Strawn LLP and LatinoJustice PRLDEF as class counsel pursuant to Federal Rule of Civil Procedure 23(g).

PLEASE TAKE FURTHER NOTICE that any opposing papers must be served by July 16, 2021 pursuant to the briefing schedule so-Ordered by the Court at ECF No. 96.

Dated: New York, New York
June 18, 2021

By: /s/ Aldo A. Badini

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TO: ALL COUNSEL OF RECORD