

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

JULIAN SANCHEZ MORA, et al.,

Plaintiffs,

v.

U.S. CUSTOMS AND BORDER
PROTECTION, et al.,

Defendants.

No. 1:24-cv-03136-BAH

**PLAINTIFFS' MOTION TO RECONSIDER DISMISSAL OF FOIA CLAIM AGAINST
DEFENDANT DEPARTMENT OF HOMELAND SECURITY**

Plaintiffs Julian Sanchez Mora, Siobhan Waldron, Carlos Moctezuma García, Ali Ainab, Rafael Edgardo Flores Rodriguez, and Beatriz Ariadna Garcia Mixcoa respectfully move for reconsideration of the decision of the U.S. District Court for the Northern District of California dismissing Plaintiffs' claim under the Freedom of Information Act against Defendant U.S. Department of Homeland Security in this putative class action. *See* Order Granting Motion to Dismiss in Part and Transferring Case, Dkt. 59 (Nov. 4, 2024). The grounds for this motion are set forth in the accompanying memorandum of law and exhibits in support of the motion. Pursuant to Local Civil Rule 7(f), Plaintiffs request an oral hearing on the motion. A proposed order also accompanies this motion.

Respectfully submitted,

s/Trina Realmuto

Trina Realmuto*
trina@immigrationlitigation.org

s/Mary Kenney

Mary Kenney (DC SBN 1044695)
mary@immigrationlitigation.org

s/Kristin Macleod-Ball

Kristin Macleod-Ball*
kristin@immigrationlitigation.org

s/Tomás Arango

Tomas Arango*
tomas@immigrationlitigation.org

NATIONAL IMMIGRATION
LITIGATION ALLIANCE

10 Griggs Terrace
Brookline, MA, 02446
(617) 819-4447

* *Admitted pro hac vice*

s/Matt Adams

Matt Adams*
matt@nwirp.org

s/Leila Kang

Leila Kang*
leila@nwirp.org

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Avenue, Suite 400
Seattle, WA 98104
(206) 957-8611

s/Marc Van Der Hout

Marc Van Der Hout*

s/Johnny Sinodis

Johnny Sinodis*

VAN DER HOUT LLP
360 Post St., Suite 800
San Francisco, CA 94108
(415) 981-3000
ndca@vblaw.com

Attorneys for Plaintiffs

Dated: January 31, 2025

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of for the District of Columbia by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

s/Trina Realmuto

Trina Realmuto

National Immigration Litigation Alliance