

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHONICE G. GARNETT, *et al.*,

Plaintiffs,

v.

LAURA ZEILINGER,

Defendant.

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) Civil Action No. 1:17-cv-1757
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PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Individually Named Plaintiffs Shonice G. Garnett, Richard Messick, Jr., Linda Murph, and Tracey Ross ("Plaintiffs"), hereby move, pursuant to Rule 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure, for certification of the following two classes:

1. All District of Columbia residents, since June 1, 2016: (1) who have applied, are applying, or will apply for SNAP benefits through an initial or recertification application; and (2) who have had or will have the processing of such application delayed beyond the timeframes mandated by law.
2. All District of Columbia SNAP recipients, since June 1, 2016: (1) who have been or will be required to submit a recertification application to maintain SNAP benefits; (2) as to whom Defendant has failed or will fail to issue notice of the need to recertify; and (3) who have been or will be terminated from participation in SNAP due to Defendant's failure to issue such notice.

Plaintiffs request that this action be certified as a class action for litigation and trial of Plaintiffs' claims under the federal SNAP Act (7 U.S.C. §§ 2014, 2020 (e)(3), (4), (9)) and its

implementing regulations, as well as the Due Process Clause of the Fourteenth Amendment of the United States Constitution. Plaintiffs further request that the named Plaintiffs be appointed Class representatives as follows: Shonice G. Garnett, Richard Messick, Jr., and Linda Murph for Class One; and Tracey Ross for Class Two.

This Motion is supported by the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification.

Respectfully Submitted,

Date: August 28, 2017

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* Certification to practice pursuant to LCvR 83.2(g) to be submitted.

[†] Application for admission *pro hac vice* to be sought.

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[‡] Admission to the US District Court for the District of Columbia pending.

CERTIFICATE OF SERVICE

I certify that, on August 28, 2017, I caused a copy of this motion and the accompanying memorandum and exhibits to be served on the following via certified mail:

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