

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LIYANARA SANCHEZ, as next friend on behalf of
FRENGEL REYES MOTA, *et al.*,

Petitioners–Plaintiffs,

J.G.G., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No: 1:25-cv-00766-JEB

**PETITIONERS-PLAINTIFFS’ AND PLAINTIFFS’ MOTION FOR CLASS
CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

Plaintiffs and Petitioners-Plaintiffs (“Petitioners”)¹ by and through undersigned counsel, hereby move the Court for an order certifying this matter as a class action and designating undersigned counsel as class counsel. The grounds for this motion are set forth in the supporting Memorandum of Law and declaration, which are filed concurrently with this Motion

¹ Plaintiffs are the original Plaintiffs in *J.G.G. v. Trump*. Because Plaintiffs have filed habeas actions in their districts of confinement and do not seek relief in this Court through the writ of habeas corpus, they continue to be designated as “Plaintiffs,” not “Petitioners.” Petitioners-Plaintiffs (“Petitioners”) refer to the newly amended individuals who are designated under the Proclamation and detained in El Salvador or in criminal custody in the United States. Petitioners are pursuing their claims through habeas in addition to APA and equity.

WHEREFORE, Plaintiffs and Petitioners respectfully move this Court to amend the provisionally certified class of:

“All noncitizens in U.S. custody who are subject to the March 15, 2025, Presidential Proclamation entitled ‘Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua’ and its implementation.”

To the following class definition:

All noncitizens who were, are, or will be subject to the March 2025 Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of the United States by Tren De Aragua” and/or its implementation.

Petitioners also move the Court to certify the following subclasses:

SUBCLASS 1 (“CECOT Subclass”): All noncitizens in custody at the Terrorism Confinement Center (“CECOT”) in El Salvador who were, are, or will be subject to the March 2025 Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of the United States by Tren De Aragua” and/or its implementation.

SUBCLASS 2 (“Criminal Custody Subclass”): All noncitizens in criminal custody who were, are, or will be subject to the March 2025 Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of the United States by Tren De Aragua” and/or its implementation.

Plaintiffs move for an order appointing them as representatives of the amended class.

Petitioners further move for an order appointing them as representatives of the amended class and new subclasses defined above. Plaintiffs and Petitioners move to appoint undersigned counsel as counsel for the amended class and new subclasses.

Plaintiffs and Petitioners further move for an order requiring the government to identify members of the class and subclasses, and provide notice when a new class or subclass member is designated.

This Motion is made pursuant to the Federal Rule of Civil Procedure 23(a) and 23(b)(2) or, in the alternative, under principles of habeas jurisdiction and equity with Federal Rule of Civil Procedure 23 as a guidepost. The Motion is based upon a supporting Memorandum of Law and accompanying declaration, which is filed concurrently with this Motion.

Dated: April 24, 2025

Respectfully submitted,

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