

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

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ANGELICA S., *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, *et al.*,

Defendants.

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No. 1:25-cv-1405

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

Plaintiffs Angelica S., Eduardo M., Liam W., Leo B., and Xavier L., on behalf of themselves and all others similarly situated, pursuant to Federal Rule of Civil Procedure 23(c)(1) and Local Civil Rule 23.1(b), move for the Court to certify a class under Federal Rule of Civil Procedure 23(b)(2) consisting of: All unaccompanied children who are or will be in the custody of HHS and who (a) have or had a potential sponsor who has been identified; and (b) have not been released to a sponsor in whole or in part because they are missing documents newly required on or after March 7, 2025.

The grounds for Plaintiffs' motion are set forth in the accompanying Memorandum of Points and Authorities.

On May 8, 2025, Plaintiffs' counsel provided Alex Haas, Diane Kelleher, and John Griffiths, the Directors of the Federal Programs Branch of the U.S. Department of Justice's Civil Division, with a copy of Plaintiffs' Complaint which contains Plaintiffs' class action allegations. On May 9, 2025, Plaintiffs' counsel asked to confer regarding this class certification motion.

However, counsel for Plaintiffs have not yet been informed of Defendants' position on this motion.

May 9, 2025

Respectfully submitted,

/s/ David Hinojosa

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\* Application for D.D.C. admission pending

\*\* *Pro hac vice* pending

\*\*\* *Pro hac vice* forthcoming

**CERTIFICATE OF SERVICE**

I certify that on May 9, 2025, I caused the foregoing to be mailed to the following addresses:

U.S. Department of Health and Human Services  
200 Independence Avenue SW  
Washington, DC 20201

Robert Francis Kennedy Jr.  
Secretary, Department of Health and Human Services  
200 Independence Ave. SW  
Washington, DC 20201

Angie Salazar  
Acting Director of Office of Refugee Resettlement  
330 C. Street, SW  
Washington, DC 20201

U.S. Department of Health and Human Services  
Robert F. Kennedy Jr., Secretary of Health and Human Services  
Angie Salazar, Acting Dr. of the Office of Refugee Resettlement  
c/o U.S. Attorney General  
950 Pennsylvania Ave., NW  
Washington, DC 20530

U.S. Department of Health and Human Services  
Robert F. Kennedy Jr., Secretary of Health and Human Services  
Angie Salazar, Acting Dr. of the Office of Refugee Resettlement  
c/o Civil Process Clerk, U.S. Attorney's Office for the District of Columbia  
601 D. Street, NW  
Washington, DC 20004

/s/ Rebecca Wolozin

Rebecca Wolozin