

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

SVITLANA DOE, et al.,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, et al.,

Defendants.

Civil Action No.: 1:25-cv-10495-IT

**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
REGARDING THE MASS TRUNCATION OF CHNV PAROLE**

Plaintiffs hereby pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1 for partial summary judgment on their claims regarding the mass truncation of all unexpired grants of parole (and associated employment authorization) that had been issued to individuals through the parole processes for nationals of Cuba, Haiti, Nicaragua, and Venezuela ("CHNV"). As set forth in their accompanying memorandum of law, exhibits, and statement of undisputed facts ("SUF"), there are no disputes of material fact and Plaintiffs are entitled to judgment as a matter of law, as is plain now that Defendants have produced the "whole record" on which their adherence to law is evaluated at final judgment. 5 U.S.C. § 706.

Plaintiffs respectfully request that this Court enter summary judgment for Plaintiffs and vacate the mass truncation of CHNV parole and associated employment authorization. If it would aid the Court, Plaintiffs' counsel is available for oral argument, in person or virtually.

Dated: June 16, 2025

Esther H. Sung (*pro hac vice*)
Karen C. Tumlin (*pro hac vice*)
Hillary Li (*pro hac vice*)
Laura Flores-Perilla (*pro hac vice*)
Brandon Galli-Graves (*pro hac vice*)
JUSTICE ACTION CENTER
P.O. Box 27280
Los Angeles, CA 90027
Telephone: (323) 450-7272
esther.sung@justiceactioncenter.org
karen.tumlin@justiceactioncenter.org
hillary.li@justiceactioncenter.org
laura.flores-perilla@justiceactioncenter.org
brandon.galli-graves@justiceactioncenter.org

Anwen Hughes (*pro hac vice*)
Inyoung Hwang (*pro hac vice*)
HUMAN RIGHTS FIRST
75 Broad St., 31st Fl.
New York, NY 10004
Telephone: (212) 845-5244
HughesA@humanrightsfirst.org
hwangs@humanrightsfirst.org

Robert Stout (*pro hac vice*)
Sarah Elnahal (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: (212) 836-8000
rob.stout@arnoldporter.com
sarah.elnahal@arnoldporter.com

Respectfully submitted,

/s/ Justin B. Cox
Justin B. Cox (*pro hac vice*)
LAW OFFICE OF JUSTIN B. COX
JAC Cooperating Attorney
PO Box 1106
Hood River, OR 97031
(541) 716-1818
justin@jcoxconsulting.org

John A. Freedman (BBO#629778)
Laura Shores (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave, NW
Washington, D.C. 20001-3743
Telephone: (202) 942-5316
john.freedman@arnoldporter.com
laura.shores@arnoldporter.com

H. Tiffany Jang (BBO#691380)
ARNOLD & PORTER KAYE SCHOLER LLP
200 Clarendon Street, Fl. 53
Boston, MA 02116
Telephone: (617) 351-8053
tiffany.jang@arnoldporter.com

Daniel B. Asimow (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
Three Embarcadero Center
10th Floor
San Francisco, CA 94111-4024
Telephone: (415) 471-3142
daniel.asimow@arnoldporter.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Justin B. Cox, hereby certify that this document and all accompanying exhibits and memorandum of law were filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: June 16, 2025

/s/ Justin B. Cox
Justin B. Cox