

**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.

C.A. No: 1:25-cv-10495-IT

PLAINTIFFS' SUPPLEMENTAL MOTION FOR CLASS CERTIFICATION

Plaintiffs, including the Proposed Class Representatives Svitlana Doe, Maksym Doe, Maria Doe, Alejandro Doe, Armando Doe, Ana Doe, Carlos Doe, Omar Doe, Kyle Varner, Wilhen Pierre Victor, Valentin Rosales Tabares, Marim Doe, Adolfo Gonzalez, Jr., Aleksandra Doe, Teresa Doe, Rosa Doe, Norma Lorena Dus, Gabriela Doe, Daniel Doe, Miguel Doe, and Lucia Doe ("Proposed Class Representatives"), on behalf of themselves and the proposed class they seek to represent, move to certify a class pursuant to Rule 23. This motion supplements Plaintiffs' prior certification motion (Doc. No. 46) to expand the proposed class definition to add an additional subclass, as well as to appoint additional Class Representatives.

The Proposed Class Representatives respectfully request that this Court issue an order certifying a class that is defined as:

- a) All individuals with pending applications to sponsor a beneficiary for any humanitarian parole process, including but not limited to U4U, CHNV, FRP, MPIP, and CAM, which applications are subject to the January 20 Huffman memo and subsequent actions by Defendants to pause or otherwise terminate the processing of such applications (the "Sponsor Subclass");
- b) All individuals who have received parole through humanitarian parole processes, including but not limited to U4U, CHNV, OAW, FRP, MPIP, and CAM, which parole is subject to the March 25 FRN and subsequent similar actions by Defendants to rescind individual grants of parole on a categorical and *en masse* basis (the "Rescinded Parolee Subclass"); and

- c) All individuals who have received humanitarian parole through already established humanitarian parole processes, such as the U4U, CHNV, OAW, FRP, MPIP, and CAM parole processes, with any pending applications for any additional immigration benefit, which applications are subject to the “administrative hold” set out in the February 14 Davidson memorandum, the January Higgins Directive, and other subsequent actions by Defendants to pause or otherwise terminate the processing of such applications (the “Immigration Benefits Subclass”).

Plaintiffs would exclude from the class definition any individuals or groups who choose to opt out of the class in order to seek relief in separate litigation.

The Plaintiffs also respectfully request that this Court appoint the undersigned as class counsel and the Proposed Class Representatives as class representatives.

The basis for this motion for class certification is that the proposed class meets all of the requirements for class treatment under Rule 23(a) and (b)(2), and the proposed class counsel meet all of the requirements set forth in Rule 23(a) and (g). The grounds for this motion are explained in the accompanying memorandum of law.

A Proposed Order is filed herewith.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request an oral argument Pursuant to Local Rule 7.1(d). Plaintiffs note that the Court has scheduled argument for April 10 on this motion. Doc. No. 63.

Dated: March 27, 2025

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Respectfully submitted,

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CERTIFICATE UNDER LOCAL RULE 7.1(a)(2)

The parties have conferred pursuant to Local Rule 7.1(a)(2). Defendants oppose this motion.

Dated: March 27, 2025

/s/ John A. Freedman
John A. Freedman

CERTIFICATE OF SERVICE

I, John A. Freedman, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: March 27, 2025

/s/ John A. Freedman
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