## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

D.N.N. and V.R.G, on behalf of themselves and all others similarly situated,

Petitioners-Plaintiffs,

Case No. 1:25-cv-01613

v.

NIKITA BAKER, et al.,

Respondents-Defendants.

## PETITIONERS-PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs D.N.N. and V.R.G. ("Plaintiffs") on behalf of themselves and all others similarly situated, by and through their undersigned counsel, move pursuant to Fed. R. Civ. P. 23 to proceed as a class action and for certification of the following Class: All persons who are now or in the future will be detained in the Hold Rooms at the Immigration and Customs Enforcement Baltimore Field Office.

For the reasons set forth in the accompanying Memorandum of Law in Support, which is incorporated by reference, the proposed Class satisfies all requirements of Fed. R. Civ. P. 23, and Plaintiffs are each appropriate Class Representatives. Plaintiffs respectfully request this Court GRANT Plaintiffs' Motion for Class Certification, allow this action to proceed as a class action, certify the identified Class, appoint Plaintiffs as Class Representatives of the same, and appoint National Immigration Project, Amica Center for Immigrant Rights, and Crowell & Moring LLP as Class counsel.

1

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Respectfully Submitted,

/s/ Jerome A. Murphy

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Pro bono counsel for Plaintiffs

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<sup>\*\*</sup> Pro Hac Vice forthcoming