

Paul Carlos Southwick (ISB No. 12439)  
Emily Myrei Croston (ISB No. 12389)  
ACLU OF IDAHO FOUNDATION  
P.O. Box 1897  
Boise, ID 83701  
Tel: (208) 344-9750  
[psouthwick@acluidaho.org](mailto:psouthwick@acluidaho.org)  
[ecroston@acluidaho.org](mailto:ecroston@acluidaho.org)

Joanna Cuevas Ingram\*  
Kevin Siegel\*  
NATIONAL IMMIGRATION LAW  
CENTER  
P.O. Box 34573  
Washington, D.C. 20043  
Tel: (213) 639-3900  
[cuevasingram@nilc.org](mailto:cuevasingram@nilc.org)  
[siegel@nilc.org](mailto:siegel@nilc.org)

Tanya Broder\*  
NATIONAL IMMIGRATION LAW  
CENTER  
3450 Wilshire Blvd. No. 108-62  
Los Angeles, CA 90010  
Tel: (213) 639-3900  
[broder@nilc.org](mailto:broder@nilc.org)

Seth D. Levy (ISB No. 10703)  
Vincent C. Capati\*  
Jacqueline D. Relatores\*  
NIXON PEABODY LLP  
300 South Grand Avenue, Suite 4100  
Los Angeles, CA 90071-3151  
Tel: (213) 629-6000  
[slevy@nixonpeabody.com](mailto:slevy@nixonpeabody.com)  
[vcapati@nixonpeabody.com](mailto:vcapati@nixonpeabody.com)  
[jrelatores@nixonpeabody.com](mailto:jrelatores@nixonpeabody.com)

Brian J. Whittaker\*  
NIXON PEABODY LLP  
799 Ninth Street, N.W., Suite 500  
Washington, D.C. 20001  
Tel: (202) 585-8000  
[bwhittaker@nixonpeabody.com](mailto:bwhittaker@nixonpeabody.com)

Nikki Ramirez-Smith (ISB No. 9030)  
Casey Parsons (ISB No. 11323)  
Talia Burnett\*  
Neal Dougherty\*  
RAMIREZ-SMITH LAW  
444 W. Iowa Ave.  
Nampa, ID 83686  
Tel: (208) 461-1883  
[nsmith@nrsdt.com](mailto:nsmith@nrsdt.com)  
[cparsons@nrsdt.com](mailto:cparsons@nrsdt.com)  
[tburnett@nrsdt.com](mailto:tburnett@nrsdt.com)  
[ndougherty@nrsdt.com](mailto:ndougherty@nrsdt.com)

\*Motion for *pro hac vice* admission forthcoming  
*Attorneys for Plaintiffs (additional counsel identified on the following page)*

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

ABBY DAVIDS, MD, *et al.*,  
*Plaintiffs,*

v.

ALEX ADAMS, in his official capacity as  
Director of the Idaho Department of Health and  
Welfare, *et al.*,  
*Defendants.*

Case No. 1:25-cv-00334-AKB

**PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

Alvaro Cure Dominguez\*  
NIXON PEABODY LLP  
70 West Madison, Suite 5200  
Chicago, IL 60602-4378  
Tel: (312) 977-4400  
[acuredominguez@nixonpeabody.com](mailto:acuredominguez@nixonpeabody.com)

Plaintiffs move this court to certify a class action pursuant to Fed. R. Civ. P. 23. This motion is based on the attached memorandum of law in its support and declarations.

Plaintiffs have concurrently filed a motion for a temporary restraining order (“TRO”), preliminary injunction, and provisional class certification, which references the class certification arguments advanced in the memorandum of law attached to this motion. *See* Pls. Mem. ISO Mot. TRO, Prelim. Inj., Provisional Class Cert. (“TRO Mem.”) 18-19. Plaintiffs ask that the court consider the arguments in the accompanying memorandum in considering their concurrently filed motion for a TRO, preliminary injunction, and provisional class certification.

Dated: June 26, 2025

Respectfully submitted,

/s/ Emily Myrei Croston

Emily Myrei Croston (ISB No. 12389)  
ACLU of Idaho Foundation

**CERTIFICATE OF SERVICE**

I CERTIFY that on June 26, 2025, I served a copy of the foregoing documents by electronic mail to the following person, who has agreed to accept service on behalf of all defendants:

James Craig, Division Chief  
Civil Litigation and Constitutional Defense  
Office of the Idaho Attorney General  
700 W. Jefferson Street  
Boise, ID 83720-0010  
[James.craig@ag.idaho.gov](mailto:James.craig@ag.idaho.gov)

Dated: June 26, 2025

Respectfully submitted,

/s/ Emily Myrei Croston  
Emily Myrei Croston (ISB No. 12389)  
ACLU of Idaho Foundation