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U.S. Customs and Border Protection; GREGORY J. ARCHAMBEAULT, Director of U.S. Immigration and Custom Enforcement and Removal Operations (ERO), San Diego; DOES 1 through 20,

Defendants.

Pursuant to Civil Local Rule 40.1(f), Plaintiffs respectfully provide this notice of related case: *A.M. v. U.S. Customs and Immigration Enforcement et al.*, Case No. 3:25-cv-01412-JO-AHG (S.D. Cal.), which was filed on June 4, 2025.

This proposed class action challenges Defendants' practice of arresting people who are coming to immigration court to attend scheduled hearings before immigration judges. The proposed class is made up of people seeking asylum who have been permitted to attend hearings before immigration judges in the San Diego Immigration Court while out of custody and for whom there have been no individual changed circumstances with respect to their flight risk, risk of danger to the community, or criminal history since the beginning of their asylum proceedings. The two named Individual Plaintiffs, A.M. and C.L.V., fit this description and are willing to serve as class representatives.

The related case, *A.M. v. U.S. Customs and Immigration Enforcement et al.*, Case No. 3:25-cv-01412-JO-AHG (S.D. Cal.), was brought individually by Plaintiff A.M. (the same named Individual Plaintiff in this proposed class action). That case similarly challenges the legality of A.M.'s civil immigration arrest at the San Diego Immigration Court.

Assignment to a single district judge is likely to effect a saving of judicial effort and other economies. *See* Civ. Local Rule 40.1(f). Both A.M.'s individual case and this proposed class action focus on the legality of civil immigration arrests at the San Diego Immigration Court pursuant to Defendants' policies. As to A.M., there is

total overlap of the relevant facts in both the individual case and this proposed class action, and—clearly—the same plaintiff. There is also significant overlap of the named defendants in this proposed class action and the named defendants in A.M.'s individual case.

Even if A.M. were not a named plaintiff in the proposed class action, the central legal question it raises—whether civil immigration arrests at the San Diego Immigration Court are lawful—will also likely arise in A.M.'s individual related case. Thus, assignment to a single district judge saves judicial effort and is economical.

DATED: September 4, 2025 Respectfully submitted,

SINGLETON SCHREIBER, LLP

/s/ Kimberly S. Hutchison Kimberly S. Hutchison Attorneys for Plaintiff

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