

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

HAITIAN-AMERICANS UNITED INC.;
VENEZUELAN ASSOCIATION OF
MASSACHUSETTS; UNDOCUBLACK
NETWORK, INC.; SYDNEY DOE; MARLENE
DOE; GUSTAVO DOE; and NATALIA DOE,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; U.S. DEPARTMENT
HOMELAND SECURITY; and KRISTI NOEM, in
her official capacity as Secretary of the Department
of Homeland Security,

Defendants.

ORAL ARGUMENT REQUESTED

Civil Action No. 25-cv-10498-RGS

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs Haitian Americans United, Inc. (“HAU”), Venezuelan Association of Massachusetts (“VAM”), UndocuBlack Network Inc. (“UBN”) and four individual recipients of Temporary Protected Status (“TPS”) hereby move for partial summary judgment against Defendants Department of Homeland Security (“DHS”), DHS Secretary Kristi Noem, and President Donald J. Trump (together, the “Defendants”), both in their official capacities.

The grounds for this Motion are set forth in the accompanying Memorandum in Support of Plaintiffs’ Motion for Partial Summary Judgment and accompanying declarations.

REQUEST FOR ORAL ARGUMENT

Plaintiffs request oral argument under L.R. 7.1(d). They wish to be heard and believe that oral argument may assist the Court.

Dated: August 15, 2025

Respectfully submitted,

/s/ Mirian Albert

Mirian Albert (BBO #710093)

Oren Sellstrom (BBO #569045)

Iván Espinoza-Madrigal (BBO # 708080)

Victoria Miranda (BBO #695913)

Lawyers for Civil Rights

61 Batterymarch Street, 5th Floor

Boston, MA 02110

malbert@lawyersforcivilrights.org

osellstrom@lawyersforcivilrights.org

iespinoza@lawyersforcivilrights.org

vmiranda@lawyersforcivilrights.org

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2025, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non- registered participants.

/s/Mirian Albert
Mirian Albert (BBO #710093)