

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PABLO MORENO GONZALEZ, FELIPE
AGUSTIN ZAMACONA, and a class of
similarly situated people,

Plaintiffs,

v.

KRISTI NOEM, Secretary of the U.S.
Department of Homeland Security, in her official
capacity; TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement, in his
official capacity; MARCOS CHARLES, Acting
Executive Associate Director, U.S. Immigration
and Customs Enforcement and Removal
Operations, in his official capacity;
SAMUEL OLSON, Interim Chicago Field
Office Director, U.S. Immigration and Customs
Enforcement, in his official capacity;
GREGORY BOVINO, Commander-at-Large,
U.S. Customs and Border Protection, in his
official capacity; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.
CUSTOMS AND BORDER PROTECTION;
and the DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 25-cv-13323

Class Action

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiff Pablo Moreno Gonzalez, Felipe Agustin Zamacona, by and through their undersigned counsel, bring this Motion for Class Certification on behalf of themselves and all others similarly situated on the grounds that this lawsuit should be maintained as a class action under Rules 23(a), 23(b)(2), and 23(b)(1)(A) of the Federal Rules of Civil Procedure. For the reasons set forth in their contemporaneously filed Memorandum in Support of this Motion,

Plaintiffs respectfully move this Court to certify the following class, which satisfies all the requirements of Federal Rules of Civil Procedure 23(a), 23(b)(2), and 23(b)(1)(A):

All immigration detainees who are detained and those who will be detained in the future at the Broadview ICE facility at 1930 Beach Street, Broadview, Illinois (the “Class”).

Plaintiffs also move this Court to designate the Roger Baldwin Foundation of ACLU, Inc., the MacArthur Justice Center, and Eimer Stahl LLP attorneys as Class counsel.

WHEREFORE, Plaintiffs ask the Court to certify the Class as defined above and designated the above attorneys as Class counsel.

DATED: October 30, 2025

Respectfully submitted,

/s/ Kevin M. Fee

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