

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

RANJITHA SUBRAMANYA, individually	:	
and on behalf of a class of those similarly	:	Case No. 2:20-CV-3707
situated, et al.,	:	
	:	Chief Judge Algenon L. Marbley
Plaintiffs,	:	
	:	Magistrate Judge Elizabeth Preston Deavers
vs.	:	
	:	
UNITED STATES CITIZENSHIP AND	:	<u>JOINT FINAL CERTIFICATION</u>
IMMIGRATION SERVICES, et al.,	:	<u>PURSUANT TO CONSENT ORDER (ECF</u>
	:	<u>No. 55)</u>
Defendants.	:	

In accordance with the Consent Order,¹ proposed, and amended by the Parties, signed and entered by this Court, (ECF Nos. 54, 55, 66, and 67), the Parties respectfully represent to this Court Defendants' full, material compliance pursuant to the terms and obligations set forth in the foregoing Consent Order. Pursuant to Section VI of the Consent Order, the Parties hereby respectfully request an Order from this Court approving Defendants' Final Certification, thus, pursuant to Sections VII, and VIII, automatically terminating this Court's jurisdiction and dismissing Plaintiffs' claims, with prejudice.

Defendants herein represent that on August 20, 2020, USCIS created the Putative Class List which it used to provide the reports required under Section V of the Consent Order. On that date, there were a total of 45,565 receipt numbers comprising the Putative Class List. To date, of the remaining 56 cases: 1 receipt number represents an individual who has only provided a foreign address and USCIS sends secure identity documents to U.S. addresses. *See* USCIS Policy Manual, Vol. 11, Part A, Chapter 2, Section B; 2 receipt numbers represent individuals who had not

¹ All capitalized terms not defined herein are accorded the meanings ascribed to them in the Consent Order. ECF No. 55.

responded to communications from USCIS to execute Biometrics Capture but have since responded and those EADs have been expedited for production; and; 53 represent individuals who have not responded to communications from USCIS to execute Biometrics Capture for at least 4 months, and therefore, the Parties agree that they should no longer be considered Putative Class Members.

Pursuant to this Court's Local Civil Rule 7.3(a), counsel for Defendants consulted with counsel for Plaintiffs to which counsel for Plaintiffs have indicated that they agree, and thus join herein.

Respectfully submitted,

DAVID M. DEVILLERS
United States Attorney

s/Christopher R. Yates
CHRISTOPHER R. YATES (0064776)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
E-mail: christopher.yates@usdoj.gov

Attorney for Defendants

s/Caroline H. Gentry
CAROLINE H. GENTRY (0066136)
Porter Wright Morris & Arthur LLP
One South Main Street, Suite 1600
Dayton, Ohio 45402
E-mail: cgentry@porterwright.com

and

Robert H. Cohen (0009216)
David P. Shouvin (0066154)
Kirsten R. Fraser (0093951)
Porter Wright Morris & Arthur LLP
41 South High Street, Suites 2800-3200
Columbus, Ohio 43215
E-mail: rcohen@porterwright.com
E-mail: dshouvin@porterwright.com
E-mail: kfraser@porterwright.com

and

Ana P. Crawford (0090581)
Porter Wright Morris & Arthur LLP
250 East Fifth Street, Suite 2200
Cincinnati, Ohio 45202
Email: acrawford@porterwright.com

Attorneys for Plaintiffs