

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SILEIRI DOE, on behalf of herself and all
others similarly situated, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY et al.,

Defendants.

Case No. 1:25-cv-12245

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Individual Plaintiffs Sileiri Doe, Meryem Doe, and Olivia Doe, on behalf of themselves and the putative class, and Venezuelan Association of Massachusetts (“VAM”) on behalf of its members, (“Plaintiffs” or “Plaintiff Putative Class”) move for summary judgment pursuant to Federal Rule of Civil Procedure 56 on their claims that Defendants U.S. Department of Homeland Security (DHS) and U.S. Customs and Border Protection (CBP) violated the Administrative Procedure Act when Defendants terminated *en masse* parole for noncitizens who (i) scheduled their appointments for entry to the United States using the CBP One app; (ii) were paroled into the United States between May 16, 2023 and January 19, 2025; (iii) had their parole terminated in April 2025; and (iv) remain in the United States. *See* Complaint, ECF No. 1. For the reasons presented in the accompanying memorandum in support of this motion, Plaintiffs respectfully request that this Court enter an order (1) vacating Defendants’ decision to terminate *en masse* the parole of the Plaintiff Putative Class, (2) vacating Defendants’ terminations of parole of the Plaintiff Putative Class; (3) vacating Defendants’ actions based on the unlawful parole terminations, including revocations of employment authorization; and (4) declaring both the *en masse* parole termination decision and parole terminations unlawful. A proposed order accompanies this motion.

Due to the significant harm that Plaintiffs are experiencing and will continue to experience

while stripped of their legal right to live and work in the United States, Plaintiffs respectfully request that the Court expedite consideration of their motion.

REQUEST FOR ORAL ARGUMENT

Plaintiffs also request a hearing on this motion, and note that the parties are available the week of December 15, 2025, consistent with the parties' joint request for a briefing schedule, ECF No. 18.

Dated: October 16, 2025

Respectfully submitted,

/s/ Allyson R. Scher

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