

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SILEIRI DOE,
MERYEM DOE, and
OLIVIA DOE,
on behalf of themselves and all others similarly
situated, and
VENEZUELAN ASSOCIATION OF
MASSACHUSETTS,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY,
U.S. CITIZENSHIP AND IMMIGRATION
SERVICES,
KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security,
JOSEPH B. EDLOW, in his official capacity as
Director of U.S. Citizenship and Immigration
Services, and
RODNEY S. SCOTT, in his official capacity as
Commissioner of U.S. Customs and Border
Protection.

Defendants.

Civil Action
No. 1:25-cv-12245-ADB

**DEFENDANTS' CONSOLIDATED MOTION TO DISMISS
AND CROSS-MOTION FOR SUMMARY JUDGMENT AND
OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Defendants, by and through its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, respectfully move this Court for dismissal of the Complaint or for summary judgment in their favor on all Counts of the Complaint. In addition, Defendants oppose Plaintiff's motion for summary judgment. As grounds for their Motion to Dismiss and Cross-Motion for Summary Judgment, as well as their Opposition to Plaintiffs' Motion for Summary Judgment, Defendants rely upon the reasons set forth in their accompanying memorandum of law.

WHEREFORE, Defendants respectfully request that the Court dismiss the Complaint or grant summary judgment in favor of Defendants on all Counts of the Complaint.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

Dated: November 6, 2025

By: /s/ Shawna Yen
Shawna Yen Assistant U.S. Attorney
U.S. Attorney's Office
John J. Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
Tel.: 617-748-3100
Email: Shawna.Yen@usdoj.gov

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Shawna Yen, Assistant United States Attorney certify that I emailed Plaintiffs' counsel about this Motion on November 5, 2025, and the parties were unable to resolve or narrow the issues.

Dated: November 6, 2025

By: /s/ Shawna Yen
Shawna Yen
Assistant U.S. Attorney
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
Tel.: 617-748-3100
Email: Shawna.Yen@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system 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.

Dated: November 6, 2025

By: /s/ Shawna Yen
SHAWNA YEN
Assistant U.S. Attorney