IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

J.Z., *et al*., *Plaintiffs*, v. DEPARTMENT OF HOMELAND SECURITY, *et al.*, *Defendants*.	Case No. 1:26-cv-1510

NOTICE OF FACTUAL DEVELOPMENTS

Plaintiffs write to provide the Court the following status updates:

1. **Plaintiff R.M.** On or around July 6, 2026, Plaintiff R.M.'s immigration attorney received a new biometrics appointment notice from USCIS, scheduling him for a biometrics appointment on July 17, 2026.[1] On July 6, 2026, R.M.'s attorney sent an email to ICE requesting that ICE take R.M.'s fingerprints pursuant to the July 1 email to ICE staff that Defendants filed in this case (Dkt. No. 38-1). But ICE did not transport R.M. to the July 17 appointment or take his biometrics. An ICE deportation officer instructed R.M.'s attorney to contact the USCIS application support center in Albuquerque, N.M., to reschedule the biometrics appointment, suggesting that ICE will not take R.M.'s biometrics. R.M.'s attorney contacted USCIS to reschedule the appointment, but USCIS has refused to do so.

[1] R.M.'s previous biometrics appointment was on December 5, 2025 (while he was already detained) but ICE did not transport him to the appointment. R.M. Decl. ¶ 9, Dkt. No. 14-6.

2. **M.C.** M.C. has requested that USCIS reconsider the denial of her application for a U visa, which USCIS denied for lack of biometrics. USCIS has not acted on that request. If USCIS denies M.C.'s request for reconsideration, she intends to file a new application for a U visa.

3. **J.Z.** ICE collected J.Z.'s fingerprints and sent them to the local (South Chicago) USCIS Application Support Center, but they were returned to sender. Despite requests from J.Z.'s immigration attorney, ICE has not indicated whether it resent the fingerprints, and USCIS has not indicated whether it received J.Z.'s fingerprints from ICE. DHS still has not taken J.Z.'s photograph or signature for purposes of his SIJS application.

4. **Y.P.** ICE collected Y.P.'s fingerprints, and USCIS received them, but DHS still has not taken his photograph or signature for purposes of his adjustment-of-status application.

5. **Luis Estrada Trejo.** ICE has taken Mr. Estrada Trejo's fingerprints, but DHS still has not taken his photograph or signature for purposes of his adjustment application.

6. **H.A.** USCIS has taken H.A.'s biometrics for purposes of his derivative asylum application.

Although ICE has taken fingerprints for J.Z., Y.P., and Luis Estrada Trejo, their claims are still live because there is no evidence that USCIS has accepted J.Z.'s fingerprints for processing, and DHS has not taken all of the biometrics required for their applications with USCIS. *See* Reply in Supp. of Mot. for Stay and Prelim. Inj. 4, Dkt. No. 24 (citing USCIS policies indicating that biometrics include photographs and signatures as well as fingerprints).

Furthermore, H.A. remains an adequate class representative even though DHS has taken his biometrics. *See* Reply in Supp. of Mot. for Class Cert. 21, Dkt. No. 35 (explaining that mootness of class representative's individual claims does not defeat adequacy or typicality).

Respectfully submitted,

DATE: June 22, 2026

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CERTIFICATE OF SERVICE

I certify that I served the foregoing notice on counsel for Defendants by filing them through the court's electronic filing system.

DATE: June 22, 2026

/s/ Sean Ouellette
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