

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOHON ELIAS SUAZO-MULLER, *et al.*,

*Plaintiffs, on behalf of themselves and all those
similarly situated*

v.

KRISTI NOEM, Secretary of Homeland Security, in
her official capacity, *et al.*,

Defendants.

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Case No. 1:25-cv-418-CJN

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION
AND APPOINTMENT OF CLASS COUNSEL**

Plaintiffs hereby move this Court to certify a class pursuant to Rule 23 of the Federal Rules of Civil Procedure and Local Rule 23.1 to appoint class counsel. In support of this motion, Plaintiffs rely on the accompanying memorandum and declarations. A proposed order is attached for the Court's convenience.

STATEMENT PURSUANT TO LOCAL RULE 7(m)

Plaintiff's counsel has conferred with Defendants' counsel to determine if Defendants would consent to the relief requested in this motion. Defendants OPPOSE this motion.

Dated: April 26, 2025

Respectfully submitted,

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**Pro bono representation certificates
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