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12 **Pro hac vice application forthcoming.*

13 UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 JANAN VARGHESE JACOB, et al.,

16 Plaintiffs,

17 v.

18 DONALD J. TRUMP, et al.,

19 Defendants.

Case No. 3:21-cv-261

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
CLASS CERTIFICATION**

NOTICE OF MOTION AND MOTION FOR CERTIFICATION

TO THE COURT, ALL PARTIES AND COUNSEL OF RECORD:

20 NOTICE IS HEREBY GIVEN THAT, as soon as they may be heard, Plaintiffs, by and
21 through undersigned counsel, respectfully move this Court, pursuant to Rule 23 of the Federal
22 Rules of Civil Procedure, for an Order:
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24

25 A. Certifying the following proposed class:

26 All immigrants impacted by Presidential Proclamation 10014 and
27 its extensions, including but not limited to: (F1) Unmarried sons
28 and daughters of U.S. citizens, (F2A) Spouses and Children of Per-
manent Residents, (F2B) Unmarried Sons and Daughters of Per-

1 permanent Residents, (F3) Married Sons and Daughters of U.S. Citi-
2 zens, (F4) Brothers and Sisters of Adult U.S. Citizens, (IR-5) Par-
3 ents of a U.S. Citizen who is at least 21 years old, and Diversity
4 Visa program selectees;¹

5 B. Appointing Plaintiff JANAN VARGHESE JACOB as representative of the
6 class defined above;

7 C. Appointing Plaintiffs' counsel as counsel for the class; and

8 D. Requiring the government to identify and recognize all members of the class.

9 This Motion is made pursuant to the Federal Rule of Civil Procedure 23, on the ground that
10 Plaintiffs meet the requirements for class certification under Rules 23(a) and 23(b)(2). This Motion
11 is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and
12 Authorities in Support of Class Certification, any oral arguments that may be heard, the complete
13 files and records of this action, and all other pleadings, papers, records and documentary materials
14 on file in this action, those matters of which the court may take judicial notice, and such other and
15 further matter as the Court may consider.

16 Dated: January 11, 2021

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18 Respectfully submitted,

19 /s/ Curtis Lee Morrison
20 CURTIS LEE MORRISON