

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

_____)	
ALYSE SANCHEZ, <i>et al.</i> ,)	
)	
Plaintiffs-Petitioners,)	
)	Civil No. 8:19-cv-01728-GJH
v.)	
)	
KEVIN MCALEENAN, <i>et al.</i> ,)	
)	
Defendants-Respondents.)	
_____)	

PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION

Pursuant to Fed. R. Civ. P. 23(c), Plaintiffs-Petitioners (“Plaintiffs”), by and through counsel, respectfully move this Court to certify the proposed class, appoint Plaintiffs as class representatives, and appoint the undersigned counsel, Nicholas T. Steiner, David Rocah, Maria E. Rodriguez, and Nathaniel S. Berry as class counsel. The proposed class meets the requirements of numerosity, commonality, typicality, and adequacy of representation of Rule 23(a) and the requested injunctive and declaratory relief meets the requirements of Rule 23(b)(2) because it is appropriate for the class as a whole. In the alternative to certification under Rule 23, Plaintiffs seek certification of this case as a representative habeas action. The basis for this motion is set forth in the accompanying Memorandum of Law and other supporting papers.

Dated: August 13, 2019
Baltimore, MD

Respectfully Submitted,

/s/
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