

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

TAHIRIH JUSTICE CENTER, *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Civil Action No. 21-124 (TSC)

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiffs respectfully move for summary judgment on the first, second, and third claims in their complaint, for vacatur of the final rule challenged in this action, and for a declaratory judgment. In support of this motion, Plaintiffs submit a memorandum of law, a statement of undisputed material facts, the declaration of Adilene Nunez Huang, the declaration of Mayabanza Sylena Bangudi, the declaration of Brian R. Frazelle together with the exhibits attached thereto, and a proposed order.

Dated: May 31, 2024

Respectfully submitted,

/s/ Brian R. Frazelle

Brian R. Frazelle

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