

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

MARIA ALEJANDRA CELIMEN SAVINO,
et al.,

Petitioners-Plaintiffs,

v.

THOMAS HODGSON, et al.,

Respondents-Defendants.

Case No. 1:20-cv-10617-WGY

**PETITIONERS-PLAINTIFFS' MOTION FOR CLASS CERTIFICATION
OR REPRESENTATIVE HABEAS ACTION**

Petitioners-Plaintiffs and the proposed class, by and through their undersigned counsel, hereby respectfully move this Court for an order certifying a class pursuant to Fed. R. Civ. P. 23, or in the alternative, to certify a representative habeas class of Petitioners-Plaintiffs pursuant to *United States ex rel. Sero v. Preiser*, 506 F.2d 1115 (2d Cir. 1974). Petitioners-Plaintiffs ask this Court to certify a class consisting of all civil immigration detainees who are now or will be held by Respondents-Defendants at the Bristol County House of Corrections and the C. Carlos Carreiro Immigration Detention Center in North Dartmouth, Massachusetts. The grounds for this motion are set forth in the Memorandum in Support of Petitioners-Plaintiffs' Motion for Class Certification and Exhibits attached thereto and incorporated therein.¹

¹ Undersigned counsel did not confer under Local Rule 7.1(a)(2) because no counsel has appeared on behalf of Respondents-Defendants as of the time of filing. See Declaration of Oren Sellstrom in Support of Motion for Temporary Restraining Order.

Respectfully Submitted,

/s/ Oren Nimni

Oren Nimni (BBO #691821)
Oren Sellstrom (BBO #569045)
Lauren Sampson (BBO #704319)
Ivan Espinoza-Madrigal[†]
Lawyers for Civil Rights
61 Batterymarch Street, 5th Floor
Boston, MA 02110
(617) 988-0606
onimni@lawyersforcivilrights.org

Grace Choi, Law Student Intern^{*}
Kayla Crowell, Law Student Intern^{*}
Laura Kokotailo, Law Student Intern^{*}
Aseem Mehta, Law Student Intern^{*}
Alden Pinkham, Law Student Intern^{*}
B. Rey, Law Student Intern^{*}
Megan Yan, Law Student Intern^{*}
Reena Parikh[†]
Michael Wishnie (BBO# 568654)
Jerome N. Frank Legal Services Organization
P.O. Box 209090
New Haven, CT 06520
Phone: (203) 432-4800
michael.wishnie@ylsclinics.org

[†] Motion for admission *pro hac vice* forthcoming.

^{*} Motion for law student appearance forthcoming.

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2020, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Oren Sellstrom