

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

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES, and all  
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

**ORAL ARGUMENT REQUESTED**

**JOINT MOTION TO PRELIMINARILY APPROVE SETTLEMENT, APPROVE CLASS  
NOTICE, AND SCHEDULE FAIRNESS HEARING**

Plaintiffs and Defendant, pursuant to Fed. R. Civ. P. 23(e), hereby respectfully request that the Court enter an order substantially in the form of the Proposed Order attached to the Settlement Agreement filed concurrently herewith: (1) preliminarily approving the Settlement Agreement; (2) approving the Parties' proposed notice to class members ("Notice") (Exhibit D to the Settlement Agreement), which Notice Plaintiffs' counsel shall effectuate not later than three (3) days after the Court enters an order granting this Motion; and (3) scheduling a fairness hearing ("Fairness Hearing") no later than twenty-eight (28) days from the date this Motion is filed, at which the Parties will ask the Court to issue final approval of the Agreement. As grounds for this motion, Plaintiffs and Defendant rely on their concurrently filed Memorandum of Law in Support.

April 6, 2021

Respectfully submitted,

MARIA ALEJANDRA CELIMEN SAVINO,  
JULIO CESAR MEDEIROS NEVES

By their attorneys:

/s/ Oren Sellstrom

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

Emily Jo Coady, Law Student Intern♦  
Grace Choi, Law Student Intern  
  
Kayla Crowell, Law Student Intern  
Juan Fernando Luna León, Law Student Intern♦  
Siyuan Sonia Qin, Law Student Intern♦  
Fernando Quiroz, Law Student Intern♦  
Isir Said, Law Student Intern♦  
Michael Wishnie (BBO# 568654)  
Sara Zampierin†  
Jerome N. Frank Legal Svcs. Org.  
P.O. Box 209090  
New Haven, CT 06520  
Phone: (203) 432-4800  
michael.wishnie@ylsclinics.org

Lisa Pirozzolo (BBO #561922)  
John Butts (BBO #643201)  
Felicia Ellsworth (BBO #665232)  
Nicole M.F. Dooley (BBO #690539)  
Annaleigh Curtis (BBO #696165)  
Michael Brown (BBO #695276)  
Andy O’Laughlin (BBO #691836)  
Rama Attreya (BBO #699395)  
Gary Howell-Walton (BBO #705470)  
Mikayla C. Foster (BBO #705360)  
Elizabeth E. Driscoll (BBO #705302)  
Asma Jaber (BBO #707322) \*\*  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street, Boston, MA 02109  
Mike.Brown@wilmerhale.com

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† Admitted *pro hac vice*

\* Motion for law student appearance pending.

♦ Motion for law student appearance forthcoming.

\*\* *Pro hac vice* forthcoming

STEVEN J. SOUZA

NATHANIEL B. MENDELL  
Acting United States Attorney  
District of Massachusetts

/s/ Thomas E. Kanwit

THOMAS E. KANWIT  
Assistant U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02210

[Thomas.kanwit@usdoj.gov](mailto:Thomas.kanwit@usdoj.gov)

(617) 748-3100

Counsel for Defendant Souza and for U.S. Immigration and Customs Enforcement

Date: April 6, 2021

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2) counsel for the parties have conferred regarding this Motion, and jointly request the relief requested herein.

/s/ Oren Sellstrom

Oren Sellstrom

**CERTIFICATE OF SERVICE**

I, Oren Sellstrom, hereby certify that a true and accurate copy of this document was served via ECF to all registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as nonregistered participants on April 6, 2021.

/s/ Oren Sellstrom

Oren Sellstrom