

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

HEREDIA MONS, et al.,

Plaintiffs,

v.

ALEJANDRO N. MAYORKAS,
Secretary of Homeland Security, et al.,

Defendants.

Civil Action No. 19-1593 (JEB)

PROPOSED ORDER

UPON CONSIDERATION of the Joint Motion for Preliminary Approval of Class Action Settlement (“Joint Motion”), and the entire record herein, it is hereby ORDERED that:


1. The Joint Motion is GRANTED;
2. After a preliminary review, the Settlement Agreement appears to be fair, reasonable, and adequate. The Settlement Agreement: (a) resulted from arm’s-length negotiations between experienced counsel; (b) eliminates the risk, costs, delay, inconvenience, and uncertainty of continued litigation; (c) does not provide undue preferential treatment to Class Representatives or to segments of the Class; (d) does not provide excessive compensation to counsel for the Class; and (e) is therefore sufficiently fair, reasonable, and adequate to warrant providing notice of the Settlement Agreement to the Class. Accordingly, the Court preliminarily approves the Settlement, subject to further consideration at the Settlement Hearing described below.
3. The provisionally certified class, as defined in the Court’s January 9, 2020, provisional certification order, is certified as a class for purposes of the Settlement Agreement.
4. The Class Notice to the Class Members attached as Exhibit A to the Settlement Agreement is approved.

5. A hearing (the "Fairness Hearing") shall be held before this Court on 1/24/25 at 11:30 a.m.~~p.m.~~ at the United States District Court for the District of Columbia, 333 Constitution Avenue N.W., Washington D.C. 20001 for the following purposes:

- a. to determine whether the Settlement is fair, reasonable, and adequate, and should be approved by the Court;
 - b. to consider Class Members' objections to the Settlement, if any; and
 - c. to rule upon such other matters as the Court may deem appropriate.
6. The Court may adjourn the Fairness Hearing without further notice to the members of the Class and reserves the right to approve the Settlement Agreement with such modifications as may be agreed upon or consented to by the parties and without further notice to the Class where to do so would not impair Class Members' rights in a manner inconsistent with Rule 23 and due process of law.

7. The Court will consider comments or objections to the Settlement Agreement only if such comments or objections and any supporting papers comply with the following: that on or before sixty (60) days after issuance of this Preliminary Approval Order, any Class Member who wishes to submit comments or object to the fairness, reasonableness, or adequacy of the Settlement Agreement must file with the Clerk of Court and serve on the Parties a statement of objection setting forth the specific reason(s), if any, for the objection, including any legal support or evidence in support of the objection, grounds to support their status as a Class Member, and whether the Class Member intends to appear at the Fairness Hearing. The Parties will have ten (10) days following the objection period in which to submit answers to any objections that are filed with the Clerk of Court.

IT IS SO ORDERED, this 24th day of Oct, 2024.



JAMES E. BOASBERG
United States District Judge