IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

[redacted] LOPEZ SARMIENTO; [redacted], *on behalf of themselves and all others similarly situated,*

Petitioners-Plaintiffs,

v.

PAUL PERRY, *et al.*,

Respondents-Defendants.

Case No. 1:25-cv-01644

PETITIONERS-PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION FOR CLASS CERTIFICATION

INTRODUCTION

This case is ideal for class treatment. Numerous people are being impacted by a sweeping and unlawful shift in the Government's immigration detention policies and practices—a shift that subjects some of the most vulnerable immigrants to immediate mandatory detention, without opportunity for a pre-deprivation hearing or consideration of bond, and rescission of previously granted deferred action and work authorization. Each of the proposed class members are bound together by common questions of law and fact and would benefit from identical relief: a ruling that Respondents' policies and practices violate the APA, the INA, and due process. In the absence of class treatment, the private bar, the government, and the courts will continue to contend with an unrelenting flood of individual habeas claims raising this exact question time and time again. A

collective resolution is not merely appropriate—it is badly needed to preserve scarce legal and judicial resources and to ensure uniform access to justice for all detainees.

The Federal Rules specifically authorize this Court to address the common questions of law and fact presented by this case on a collective basis. The legality of the government's policy and practices plainly presents questions of law and fact that are "common" to all putative class members and "typical" of the class. *See* Fed. R. Civ. P. 23(a)(2), (3). The government's policy and practices are being "appl[ied] generally" to them. *See id*. 23(b)(2). The other Rule 23(a) factors are satisfied, including by the presence of multiple class representatives that have been subjected to Respondent's unlawful policies and practices. Indeed, in granting habeas relief and a temporary restraining order for one class representative, the Court already held that Respondents' policies violate due process and the INA. *See id*. 23(a)(1), (3), (4); Jan. 19, 2026 Order (Dkt. 54). Class certification is appropriate to ensure that the same relief applies to all affected individuals.

Respondents' arguments to the contrary are unavailing. First, Respondents argue that 8 U.S.C. § 1252(e)(1)(B), in combination with § 1252(e)(3), prevents class certification. Wrong. Petitioners' challenge lies wholly outside § 1252(e), and § 1252(e)(1)(B) is therefore inapplicable.

Second, Respondents claim there will be variations in the "answer" to the common questions posed by each class due to factual variations among class members, meaning the commonality and typicality requirements are not satisfied. That argument also misses the mark. Rule 23 simply requires the Court to find at least one "common contention [] of such a nature that it is capable of classwide resolution—which means that the determination of its truth or falsity will resolve an issue that is central to the validity of each one of the claims in one stroke." *See Brito v. Barr*, 395 F. Supp. 3d 135, 147 (D. Mass. 2019) (quoting *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 349–50 (2011)). Such contentions are present here. To take just two examples, Petitioners

contend that class members are entitled to bond hearings under § 1226(a) and that class members may not be re-detained unless the government can demonstrate changed circumstances justifying their re-detention. The reasoning of the Court's recent orders (Dkts. 16, 54) suggests that Petitioners are correct on both of those common contentions—but the salient point for present purposes is that the answers, regardless of what they are, are central to the validity of Petitioners' claims.

Third, Respondents argue that the Rule 23(b) requirements are not satisfied because § 1252(f)(1) prohibits classwide relief and because Petitioners' claims are better pursued through individual habeas actions. These arguments fare no better. Respondents' § 1252(f)(1) argument fails for reasons Petitioners have already explained. Class certification under Rules 23(b)(2) and 23(b)(1) is warranted because the Petitioners are subject to the unlawful and uniform application of Respondents' mandatory-detention policy to all putative class members, making the requested relief appropriate and to avoid inconsistent legal standards. And Respondents' argument that an action pursuant to a habeas petition is unfit for class treatment is especially meritless. Indeed, courts in this district and circuit have squarely rejected this argument and have certified classes pursuant to habeas petitions on multiple occasions. *See, e.g.*, *Guerra v. Perry*, No. 1:23-cv-1151 (MSN/IDD), 2024 WL 3581226, at *1 (E.D. Va. Apr. 26, 2024) (Nachmanoff, J.); *J.E.C.M. by & through Saravia v. Marcos*, 689 F. Supp. 3d 180, 192 (E.D. Va. 2023) (Brinkema, J.); *see also Bautista v. Santacruz*, 2025 WL 3713987, at *28 (C.D. Cal. Dec. 18, 2025), *judgment entered sub nom. Maldonado Bautista v. Noem*, 2025 WL 3678485 (C.D. Cal. Dec. 18, 2025) ("The accessibility of the INA's statutory protections to noncitizens is therefore uniform.").

The recurring common questions of law and fact presented in this case can be lawfully and efficiently addressed through the class process, ultimately including declaratory relief if the Court deems it warranted. Petitioners respectfully request that the Court certify the proposed class.

ARGUMENT

I. 8 U.S.C. § 1252(e)(1)(B) is Not Applicable to This Court's Ability to Certify Petitioners' Motion.

Respondents are flatly incorrect that 8 U.S.C. § 1252(e)(1)(B) bars this Court from certifying Petitioners' proposed Unaccompanied Minors (UAC) Class and Special Immigrant Juvenile status (SIJS) Class. By its plain language, § 1252(e)(1)(B) only prevents the court from certifying a class for actions authorized under a subsequent paragraph of the subsection. 8 U.S.C. § 1225(e)(1)(b). Contrary to Respondents' contention, this action does not fall under § 1225(e)(3) because it is not a challenge to a determination under § 1225(b) or its implementation. Thus, § 1252 does not affect this Court's ability to consider the merits of Petitioners' motion here.

Petitioners are not subject to expedited removal proceedings under § 1225(b)(1), nor do they challenge any written policy implementing expedited removal. Instead, Petitioners challenge Respondents' unlawful practices of misclassifying unaccompanied minors and those with or awaiting SIJS as mandatory detainees under § 1225(b)(2), denying Petitioners and those similarly situated the custody determinations required by § 1226(a), re-detaining class members without notice and a hearing, and stripping class members of deferred action and employment authorization without legal basis. Thus, Petitioners' challenge lies wholly outside § 1252(e).

Indeed, this Court has already determined in this case that "Petitioners' detention is governed by 8 U.S.C. § 1226(a)'s discretionary framework, not § 1225(b)'s mandatory detention procedures," consistent with the interpretation of other district courts. November 5, 2025 Order (Dkt. 16 at 4-5); *see also Bautista v. Santacruz*, 2025 WL 3713987, at *23 ("Because the premise

of Petitioners' claim is that the proper governing authority over their detention is § 1226 rather than § 1225, the Court does not find § 1252(e)(3)(A) prohibits this Court from ruling on this Class Certification Motion."). Respondents' efforts to recast these claims as § 1225(b) implementation challenges are both factually and legally incorrect. Because Petitioners do not bring an action within § 1252(e)(3), the class action bar in § 1252(e)(1)(B) is wholly inapplicable here.

II. Petitioners Meet All Requirements of Rule 23(a).

The government does not contest numerosity or the adequacy of class counsel. And the government's challenges to the remaining Rule 23 factors should be rejected.

A. The Proposed Classes Satisfy the Commonality Requirement.

It is well settled that factual differences among class members do not defeat commonality. *See Broussard v. Meineke Disc. Muffler Shops, Inc.*, 155 F.3d 331, 344 (4th Cir. 1998) ("We . . . do not suggest that the commonality and typicality elements of Rule 23 require that members of the class have identical factual and legal claims in all respects."). Rather, class members need only share "a single question of law or fact." *Wal-Mart*, 564 U.S. at 369. Here, Petitioners seek declaratory relief to challenge a newly adopted nationwide policy that affects all putative class members. These challenges present not just one, but many, common questions regarding the lawfulness of this policy. *See* Mot. at 11–12. The commonality requirement is satisfied.

Respondents argue that the proposed classes lack commonality because "what Petitioners are actually seeking as relief is inherently fact-specific in terms of the legal analysis, and varies depending on the individual's circumstances." Opp. at 9. But the government fails to identify any material differences among class members that would matter for purposes of resolving the common legal questions presented here. While individuals may have differing charges of inadmissibility when they are arrested, they are bound together by common questions of law and

fact that subject them to common injuries, including immediate detention without pre-deprivation hearing, mandatory no-bond detention once detained, and, for the SIJs class members, the deprivation of deferred action. These common injuries are proper for class adjudication because they can be resolved in a single stroke upon the determination that the new policies and practices are unlawful. *See, e.g., Bautista*, 2025 WL 3713987 at *24; *Guerrero Orellana v. Moniz*, No. 25-cv-12664-PBS, 2025 WL 3033769 (D. Mass. Oct. 30, 2025). For example, the Unaccompanied Minors class presents the following common question of law: Does the new DHS mandatory detention policy, as applied to noncitizens designated as unaccompanied minors, violate the Immigration and Nationality Act and implementing regulation? If the answer to this common question is "yes," each individual would get a bond hearing automatically under § 1226(a), while a "no" would leave each person as before. *See id*. And any factual differences in individual circumstances are irrelevant to this question.

Further, Respondents assert that the Court cannot certify the proposed class because it encompasses future members, i.e., noncitizens who will be arrested and detained in the future, who have not suffered actual or imminent injury. Opp at 10. As an initial matter, this argument is inapposite to the question of commonality. Future class members will share the same common questions of law and fact as existing class members, as outlined in Petitioners' Memorandum of Law in Support of Petitioner's Motion for Class Certification. Dkt. 46 at 10-14.

To the extent that Respondents challenge standing under Article III, the Fourth Circuit has refused "to import standing concepts into the class certification analysis." *Carolina Youth Action Project v. Wilson*, 60 F.4th 770, 777 (4th Cir. 2023). Rather, "[o]nce threshold individual standing by the class representative is met, [ ] there is no further, separate 'class action standing'

requirement." *Id*. at 779 (quoting Newberg § 2:1). Respondents do not dispute that Petitioners, as class representatives, have met the Article III standing requirements.

Furthermore, courts regularly certify classes that contain future class members who are at some point subjected to the same challenged policy. *See O.A. v. Trump*, 404 F. Supp. 3d 109, 160 (D.D.C. 2019) (deeming it not "unusual or improper for a Rule 23(b)(2) class to include future members"); *CASA, Inc. v. Trump*, 793 F. Supp. 3d 703, 727 (D. Md. 2025) (certifying class including future claimants); *Guerra*, 2024 WL 3581226, at *1 (certifying a class of "[a]ll persons who, now or at any time in the future, are held in civil immigration detention within the area of responsibility of WAS ICE . . .").

That the class will continue to grow as more individuals are improperly subjected to mandatory detention does not mean that the class as defined encompasses uninjured members—a noncitizen will not become part of the class until they are detained, at which point they will suffer an actual injury when they are detained and join the class. *See Guerrero Orellana*, 2025 WL 3033769 at *7. Simply put, the existence of future class members does not pose an obstacle to certification.

B. The Proposed Classes Satisfy the Typicality Requirement.

Petitioners' claims are typical of the claims of the proposed classes because they have been designated as unaccompanied minors, with SIJS status or SIJS applications pending, and have been subjected to the same unlawful policies and practices that bind together all class members. Respondents argue that Petitioners have failed to demonstrate typicality because "Petitioners' claims that their detention should be governed by § 1226(a) is not typical of members of the class who are arguing that *any* detention is impermissible without a pre-detention hearing at which the government bears the burden of showing changed circumstances, and in turn is not typical of those

members arguing that their detention while they retain deferred action is improper *at all*." Opp. at 11. Respondents' arguments fail because these claims are not mutually exclusive and Rule 23 does not require identicality of legal claims or theories.

To satisfy the typicality requirement, a class representative's claims must be "typical" in that prosecution of the claim will "simultaneously tend to advance the interests of the absent class members." *Deiter v. Microsoft Corp.*, 436 F.3d 461, 466 (4th Cir. 2006). The claims do not have to be factually or legally identical, but the class claims should be fairly encompassed by those of the named plaintiffs. *Broussard*, 155 F.3d at 344; *Parsons v. Ryan*, 754 F.3d 657, 685 (9th Cir. June 5, 2014) (stating that claims are typical if they are "reasonably coextensive with [the claims] of absent class members" and "need not be substantially identical" (quoting *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1020 (9th Cir. 1998))). This requirement is met when the plaintiff's "claims 'arise[ ] from the same event or practice or course of conduct that gives rise to the claims of other class members, and . . . are based on the same legal theory.'" *García-Rubiera v. Calderón*, 570 F.3d 443, 460 (1st Cir. 2009) (alterations in original) (quoting *In re Am. Med. Sys., Inc.*, 75 F.3d 1069, 1082 (6th Cir. 1996)).

That standard is plainly satisfied here. Petitioners contend, for example, that they are entitled to a pre-detention hearing at which the government bears the burden of demonstrating changed circumstances; and, if re-detained after such a hearing, they must be then afforded an opportunity for release on bond. These claims are typical of claims of all members of the Unaccompanied Minors Class. They arise from the same governmental policy of subjecting certain noncitizens to immediate mandatory detention without the required demonstration, by the government, of changed circumstances and a bond hearing for those detained. Petitioners' claims are based upon the same statutory and Constitutional legal bases as absent class members.

Similarly, Petitioners with SIJS and who have received deferred action based on that status contend that their deferred action may not be rescinded without adequate process, including notice and an opportunity to contest it. These claims are typical of claims of the members of the SIJS Class for the same reasons—they arise from the same unlawful policy and practices based on shared statutory and Constitutional arguments.

III. Petitioners meet the burden to certify the proposed classes pursuant to Rule 23(b)(2) and (b)(1).

Because Respondents' uniform policy affects all proposed class members alike such that "a single . . . declaratory judgment would provide relief to each member of the class," *Wal-Mart*, 564 U.S. at 360, certification under Rule 23(b)(2) is proper. *See Reid v. Donelan*, 297 F.R.D. 185, 193 (D. Mass. 2014); *Vazquez v. Bostock*, 349 F.R.D. 333, 354-55 (W.D. Wash. 2025). Respondents' contrary position misstates the law.

A. Section 1252(f)(1) Does Not Bar Class Certification or Class-Wide Relief.

As a threshold matter, 8 U.S.C. § 1252(f)(1) does not bar class certification. Respondents argue that § 1252(f)(1) prohibits the class-wide relief sought because it would "enjoin or restrain the government's detention under § 1225(b)(2) on a classwide basis." Opp. at 11. However, § 1252(f)(1) only prevents courts of jurisdiction to "enjoin or restrain" the operation of certain provisions of the INA. *Brito v. Garland*, 22 F.4th 240, 251 (1st Cir. 2021).

Respondents incorrectly assert that § 1252(f)(1) strips this Court of "jurisdiction or authority" to enter class wide relief regarding § 1252(b)(2). Opp. at 11-12. Section 1252(f)(1) is "nothing more or less than a limit on injunctive relief," not a jurisdiction-stripping provision; it cabins only one category of remedies (class wide injunctions restraining the operation of §§ 1221–1232) and leaves courts' power to hear claims intact. It also does not bar declaratory relief or vacatur under § 706 of the APA. *See Biden v. Texas*, 597 U.S. 785, 786, 798 (2022); *Am.-Arab*

Anti-Discrimination Comm., 525 U.S. 471, 481 (1999); *Nielsen v. Preap*, 586 U.S. 392, 402 (2019); *Make the Road N.Y. v. Wolf*, 962 F.3d 612, 635 (D.C. Cir. 2020).

Respondents' reliance on *Aleman Gonzalez* is misplaced. Although the Supreme Court in *Aleman Gonzalez* held that § 1252(f) prevents lower courts from entering class-wide injunctions that "enjoin or restrain the operation" of §§ 1221-1232, the Court did *not* hold that courts lack the authority to certify classes, issue declaratory relief, or remedy constitutional or APA violations. *Garland v. Aleman Gonzalez*, 596 U.S. 543, 550 (2022). Instead, the Supreme Court explicitly reaffirmed that constitutional and statutory challenges remain reviewable even where class-wide coercive injunctions may be restricted. *Id*. at 553–54. Courts have likewise recognized that class constitutional challenges are "nowhere appear affected by § 1252(f)(1)," and that extending *Aleman Gonzalez*'s reasoning to vacatur is "particularly dubious." *Rodriguez v. Marin*, 909 F.3d 252, 256 (9th Cir. 2018); *Texas v. United States*, 40 F.4th 205, 220 (5th Cir. 2022) (per curiam).

Respondents further characterize Petitioners' request as one that would "tell the government how to carry out" § 1225(b)(2) on a class wide basis. This is not the case. Here, Petitioner's class-wide claims seek: declaratory relief on Count I and IV (Respondents' immediate mandatory detention policy violates the INA and due process); APA vacatur on Count II (Respondents' unlawful adoption of its immediate mandatory detention policy); APA vacatur on Count III (Respondents' no-bond policy is arbitrary and capricious); injunctive and declaratory relief on Count V (Respondents' re-arrest and re-detention of class members and rescission of deferred action and employment authorization violates due process); APA vacatur on Count VI (Respondents' re-arrest and re-detention of class members violates the *Accardi* doctrine); injunctive, declaratory and APA vacatur on Counts VII and VIII (Respondents' policy of summarily removing class members violates the APA and due process). *See* Second Amended

Complaint at 28–38 (Dkt. 18). Section 1252(f)(1) does not reach the majority of Petitioners' claims that seek declaratory or APA relief. The few claims that do seek injunctive relief do not implicate section 1252(f)(1) because they do not challenge the operation of §§ 1221 through 1232. Petitioners do not seek an injunction "restraining the operation" of § 1225(b)(2). Petitioners seek relief preventing DHS from misapplying § 1225(b)(2) to individuals whose detention is governed by § 1226(a). Requiring the Government to apply § 1226(a) to UAC/SIJS class members does not restrain the operation of § 1225(b)(2); it restrains only the Government's unlawful deviation from the INA.

Under any reading of § 1252(f)(1)'s limits on injunctive relief, the Government's actions are not shielded from judicial review and Petitioners' requested relief remains available.

B. The Relief Petitioners Seek Will Appropriately Address the Classes' Injuries

Contrary to Respondents' assertion that class members are not a "cohesive group," all members of each class have been (or will be) subjected to the same unlawful policy and practices, including immediate mandatory detention without the required pre-deprivation hearing or opportunity for bond. Rule 23(b)(2) exists precisely for such cases—those where the defendant "has acted or refused to act on grounds that apply generally to the class," making a single declaratory judgment appropriate for all members. Thus, class certification is appropriate because Respondents have acted on grounds generally applicable to both the UAC and SIJS classes by applying uniform unlawful policies and practices to all members of both classes. The requested declaratory relief that this policy violates the INA, APA, and Due Process Clause would benefit all putative class members equally and remedy their common injuries.

Moreover, Petitioners do not ask the Court to adjudicate whether any individual's deferred action was properly rescinded, nor do they hinge class-wide relief on setting aside such rescissions

individually. Respondents' argument ignores the First Circuit's prior holding that a class of detained immigrants may seek declaratory relief on its own. *See Brito*, 22 F.4th at 256. This is consistent with Rule 23(b)(2), where the language is in the disjunctive, requiring either "final injunctive relief or corresponding declaratory relief." And declaratory relief should materially advance the resolution of even individual cases because the federal government is expected to respect a declaratory judgment and faithfully execute the law as the court's declaration determines it. *See, e.g., Unión de Empleados de Muelles de P.R., Inc. v. Int'l Longshoremen's Ass'n, AFL-CIO*, 884 F.3d 48, 58 (1st Cir. 2018) (declaratory judgments "determine the rights and obligations of the parties so that they can act in accordance with the law").

Further, Respondents' framing that the Court should decline to resolve Petitioners' due process claims through class certification mischaracterizes both the nature of Petitioners' claims and the governing law. Courts routinely resolve such systemic procedural due process violations on a class-wide basis, including in immigration-detention cases. The First Circuit has expressly held that detention-related due process claims should be addressed "on a categorical basis" and affirmed class-wide declaratory relief defining the procedural rights of § 1226(a) detainees. *Hernandez-Lara v. Lyons*, 10 F.4th 19, 44–46 (1st Cir. 2021); *Brito*, 22 F.4th at 256–57 (affirming class-wide declaration of due-process standards at § 1226(a) bond hearings). Because the constitutional injuries arise from policies and practices that admit of declaratory resolution, a Rule 23(b)(2) class action is not only appropriate, but the most efficient and equitable means of resolving Petitioners' due-process claim "in one stroke." *Wal-Mart*, 564 U.S. at 350. It is also the most faithful and efficient vehicle to provide a remedy for each named Petitioner and putative class member.

C. Certification Is Also Proper Under Rule 23(b)(1).

Respondents' assertion that Petitioners cannot satisfy Rule 23(b)(1)(A) ignores the reality that Respondents' unlawful policies and practices create a substantial risk of incompatible legal standards if litigated piecemeal. Absent class treatment, Respondents could, for example, be required in some cases to provide § 1226(a) custody determinations, while simultaneously detaining other identically situated individuals as § 1225(b)(2) "mandatory detainees," creating exactly the "incompatible standards of conduct" Rule 23(b)(1)(A) is designed to prevent. Courts addressing one of the issues presented here have recognized that "[a] final declaratory judgment establishing a right to a bond hearing would be appropriate on a class-wide basis, and each class member could then secure a coercive remedy enforcing that right in an individual action. Rule 23(b)(2) squarely permits this procedure." *Guerrero*, 2025 WL 3033769 at *13. The risk of inconsistent adjudications regarding Respondents' immediate mandatory detention policy and practices presents precisely the scenario Rule 23(b)(1)(A) was designed to prevent: situations where the government would face incompatible standards of conduct depending on which court hears each individual case. The individualized nature of habeas relief does not eliminate the need for consistent application of the underlying legal standards governing detention policies that affect all class members similarly.

IV. Class Action Is the Correct Vehicle to Resolve Petitioners' Claims.

Lastly, Respondents' assertion that "habeas petitions are generally unfit for class actions," Opp. at 15, is contrary to a wall of precedent permitting petitioners to pursue habeas actions on a class basis. *See Rodriguez v. Hayes*, 591 F.3d 1105, 1117 (9th Cir. 2010) ("[T]he Ninth Circuit has recognized that class actions may be brought pursuant to habeas corpus."); *Bonner v. Cir. Ct. of City of St. Louis*, 526 F.2d 1331, 1335 n.4 (8th Cir. 1975) ("Habeas case class actions are allowed

in this circuit."). Courts in this district and circuit have certified classes brought pursuant to habeas petitions. *Diaz v. Hott*, 297 F. Supp. 3d 618, 626-28 (E.D. Va. 2018) (certifying a class action brought through a habeas petition); *Guerra*, 2024 WL 3581226 at *1 (same); *Coreas v. Bounds*, No. TDC-20-0780, 2020 WL 5593338, at *7 (D. Md. Sept. 18, 2020) (same).

Respondents do not provide any authority to support the notion that a Rule 23(b)(2) class action is improper under such circumstances. As one district court has explained in rejecting a similar argument, "[a] final declaratory judgment establishing a right to a bond hearing would be appropriate on a class-wide basis, and each class member could then secure a coercive remedy enforcing that right in an individual action. Rule 23(b)(2) squarely permits this procedure." *Guerrero*, 2025 WL 3033769 at *13 (citing Fed. R. Civ. P. 23 advisory committee's note to 1966 amendment (explaining that "[d]eclaratory relief 'corresponds' to injunctive relief when as a practical matter it affords injunctive relief or serves as a basis for later injunctive relief")).

CONCLUSION

Class certification for the two enumerated classes, the Unaccompanied Minors Class and the SIJS Class, is appropriate and necessary to halt the systemic violation of due process and law caused by Respondents' unlawful policy and practices. Petitioners respectfully request that the Court grant their Motion for Class Certification.

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Respectfully submitted,

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