

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

DIORIS RAMON RIVERA DE LOS SANTOS, on his
own behalf and on behalf of others similarly situated,

Petitioners-Plaintiffs,

v.

CHAD WOLF, in his official capacity as Acting
Secretary, U.S. Department of Homeland Security;
THOMAS E. FEELEY, in his official capacity as Field
Office Director, Buffalo Field Office, U.S. Immigration
& Customs Enforcement; and JEFFREY SEARLS in his
official capacity as Administrator, Buffalo Federal
Detention Facility,

Respondents-Defendants.

Case No. 20-cv-584

NOTICE OF MOTION FOR CLASS CERTIFICATION

PLEASE TAKE NOTICE that the petitioners-plaintiffs will move this Court on a return date to be determined by the Court for an order certifying the following class, along with such other and further relief as this Court deems just and proper. The proposed class is defined as follows:

All individuals who are or will be detained at the Buffalo Federal Detention Facility and who are vulnerable to COVID-19 as defined by the Centers for Disease Control and Prevention.

The petitioners-plaintiffs intend to file and serve reply papers. In support of this motion, the petitioners-plaintiffs file the attached Memorandum of Law in Support of Motion for Class Certification, which describes fully the grounds for the petitioners-plaintiffs' request, along with the Declaration of Mr. Rivera and the Declaration of Robert Hodgson with supporting exhibits.

Respectfully submitted,

/s/ Robert Hodgson

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Dated: May 18, 2020

New York, N.Y.