

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CATHOLIC LEGAL IMMIGRATION
NETWORK, INC. (CLINIC), et al.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the UNITED
STATES DEPARTMENT OF STATE,

Defendants.

Civil Action No. 1:26-cv-00858-JAV

NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the Declaration of Joanna Cuevas Ingram and accompanying Exhibits, Declaration of Charles Wheeler, Declaration of Amaha Kassa, Declaration of Agnes Kyeremaa, Declaration of Patricia Richardson, Declaration of Cesar Andred Aguirre, Declaration of Maru Mahmud Hassen, Declaration of Munthaz Hassen, Declaration of Adrian Mitchell, Declaration of Juan David Buitrago Cagua, Declaration of Alejandra Alcendra Moscote, Declaration of Andres Alfonso Medina Ramirez, Declaration of Fernando Lizcano Losada, Declaration of Lina Margarita Angulo Peñaranda, and the accompanying Memorandum of Law, Plaintiffs, by and through its undersigned counsel, hereby moves this Court, before the Honorable Jeannette A. Vargas, at the United States Courthouse, 500 Pearl Street, New York, NY, for an Order a) granting partial summary judgment in Plaintiffs' favor on Counts One, Three, and Seven of Plaintiffs' Complaint; b) vacating and setting aside Defendants' January 14, 2026,

“Immigrant Visa Processing Updates for Nationalities at High Risk of Public Benefits Usage” and “Pausing Immigrant Visa Issuances for Nationalities at High Risk of Public Charge,” 26 STATE 3740; and c) granting any other relief that the Court deems just and proper, pursuant to Federal Rule of Civil Procedure 56.

PLEASE TAKE FURTHER NOTICE that, pursuant to the parties’ consent motion (ECF No. 44), answering papers and/or cross motion, if any, must be filed and served on or before March 26, 2026.

Dated: March 10, 2026

Respectfully submitted,

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** Admitted Pro Hac Vice*

*** Petition for Attorney Admission
Forthcoming*

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Erez Reuveni, hereby certify that on March 10, 2026, I caused this Notice of Motion and the attached Memorandum of Law, Declaration of Joanna Cuevas Ingram and attached Exhibits, Declaration of Charles Wheeler, Declaration of Amaha Kassa, dated; Declaration of Agnes Kyeremaa, Declaration of Patricia Richardson, Declaration of Cesar Andred Aguirre, Declaration of Maru Mahmud Hassen, Declaration of Munthaz Hassen, Declaration of Adrian Mitchell, Declaration of Juan David Buitrago Cagua, Declaration of Alejandra Alcendra Moscote, Declaration of Andres Alfonso Medina Ramirez, Declaration of Fernando Lizcano Losada, and Declaration of Lina Margarita Angulo Peñaranda to be filed on the Court's Electronic Case Filing system, which will provide electronic notice to all counsel of record. I also emailed copies to counsel of record.

/s/ Erez Reuveni

Erez Reuveni