

District Judge Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

LEOBARDO MORENO GALVEZ,

Plaintiffs,

v.

UR JADDOU, *et al.*,

Defendants.

Case No. 2:19-cv-00321-RSL

**NOTICE OF PROPOSED  
SETTLEMENT OF ATTORNEY  
FEES, EXPENSES AND TAXABLE  
COSTS, IN CLASS ACTION**

Noting Date: May 10, 2024

*Moreno Galvez v. Jaddou*, 2:19-cv-321 (W.D. Wash.) is a lawsuit challenging U.S. Citizenship and Immigration Services' ("USCIS") former legal guidance regarding eligibility for Special Immigrant Juvenile ("SIJ") classification, and USCIS's alleged practice of not completing adjudication of SIJ petitions within 180 days of filing. On July 17, 2019, the district court in this lawsuit ("Court") certified the following class: all individuals who have been issued court orders by Washington state courts after turning eighteen years old but before turning twenty-one years old and have submitted or will submit SIJ petitions to USCIS before turning twenty-one years old. The Court issued an order called a "permanent injunction" requiring USCIS to complete adjudication of all SIJ petitions based on Washington-state court orders within 180 days, and prohibiting USCIS from applying its former legal guidance to class members' SIJ petitions. The

1 plaintiffs representing class members in this case (“Plaintiffs”) did not seek, and the Court did not  
2 award, any monetary damages in this lawsuit.

3         Recently, the attorneys for the United States government and the attorneys representing the  
4 Plaintiffs entered into an agreement to settle attorney fees, expenses, and costs incurred by the  
5 attorneys who represented the Plaintiffs and class members in this lawsuit (“Settlement”). The  
6 attorneys who represented the Plaintiffs and class members were/are employed by Northwest  
7 Immigrant Rights Project. Under the Settlement, USCIS will pay a sum of \$400,000 in attorneys’  
8 fees, expenses, and costs. The full Settlement and a copy of this notice is available at:  
9 [https://www.uscis.gov/laws-and-policy/other-resources/uscis-class-action-settlement-notices-](https://www.uscis.gov/laws-and-policy/other-resources/uscis-class-action-settlement-notices-and-agreements)  
10 [and-agreements](https://www.uscis.gov/laws-and-policy/other-resources/uscis-class-action-settlement-notices-and-agreements), and <https://www.nwirp.org/>. This Settlement does not change the permanent  
11 injunction order described above. The payment under this Settlement does not come from any  
12 money that would be available for purposes other than compensating the attorneys who represented  
13 the Plaintiffs and class members in this case. As stated above, no monetary damages were awarded  
14 in this case, and because the claims in this lawsuit arose under the Administrative Procedure Act,  
15 5 U.S.C. §§ 701-706, monetary damages were not available to Plaintiffs or class members.

16         In exchange for and effective upon receipt of payment of the agreed amount, Plaintiffs will  
17 release the United States government defendants from any and all claims by Plaintiffs and  
18 Plaintiffs’ attorneys for or arising from attorneys’ fees for work that has been performed or  
19 payment or reimbursement of expenses or costs that have been incurred in connection with this  
20 lawsuit, including but not limited to fees and non-taxable expenses pursuant to the Equal Access  
21 to Justice Act, 28 U.S.C. § 2412, and taxable costs. Plaintiffs and Plaintiffs’ counsel also agree not  
22 to refer to, rely on, or cite to the Settlement, or any discussions leading up to the Settlement, in any

1 future litigation or other proceeding.

2 If you would like more information about the proposed settlement, please contact  
3 Plaintiffs' attorneys, care of:

4 Matt Adams  
5 Northwest Immigrant Rights Project  
6 615 2nd Avenue, Suite 400  
7 Seattle, WA 98104

8 Before the Settlement can become final, it must be approved by the Court. The U.S. District  
9 Court for the Western District of Washington will review the proposed Settlement and any  
10 objections from class members. Any class member may object to the proposed settlement of  
11 attorneys' fees and costs. If you are a class member and you wish to object to the Settlement, then  
12 you must send your objection in writing, by no later than July 11, 2024. Any objection must  
13 include: (a) a written statement identifying the class member's name, address, telephone number,  
14 and signature, and, if represented by counsel, the name, address, and telephone number of counsel;  
15 (b) a written statement explaining the class member's objection and the reasons for such objection;  
16 (c) any documentation in support of such objection; and (d) whether the class member wishes to  
17 present the objection to the Court at a hearing. The objection must be filed with the Clerk of the  
18 United States District Court for the Western District of Washington, 700 Stewart Street, Suite  
19 2310, Seattle, WA 98101. Docketing of the objection in CM/ECF will constitute service of the  
20 objection on the parties.

21 The Court will hold a Final Approval Hearing on September 5, 2024, at 11:30 a.m., in  
22 Courtroom 15106. At the Hearing, the Court will hear and resolve objections and determine  
whether the Settlement Agreement is fair and reasonable and should be approved. If no objections

1 are filed, the Final Approval Hearing may be held by virtual means.

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