

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LIYANARA SANCHEZ, as next friend on behalf of
FRENGEL REYES MOTA, *et al.*,

Petitioners–Plaintiffs,

J.G.G., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No: 1:25-cv-00766-JEB

PLAINTIFFS’ MARCH 9 NOTICE IN RESPONSE TO ECF NO. 247

Plaintiffs continue their outreach and report here on “the number of Plaintiffs (in Venezuela or third countries) who wish to file supplements to their habeas class petition, including challenges to the Proclamation or their identification as TdA members.” ECF No. 247 at 6. Such supplemental filings would be done from abroad. *See id.*

Counsel has thus far been able to obtain the preferences for ninety-one (91) Plaintiffs. Since the last report to the Court on February 27, Plaintiffs’ counsel received a class list of 137 class members from the Government and reached about 15 more Plaintiffs. Plaintiffs have some reason to believe the 137 is not exhaustive. Specifically, counsel notes that there are two individuals reached and their wishes reported who are not on the Government’s class list. The parties are conferring about whether they are in fact class members. Counsel will continue their efforts to reach the remaining individuals; some individuals appear to still be detained in Venezuela, making it difficult to secure their preferences.

Of the 91 who have told counsel their preference, one individual has indicated he does not wish to challenge his designation by any means.

Sixty eight (68) wish to file supplements to their habeas class petition.

Additionally, Plaintiffs’ counsel reported on February 27 on a separate group: nineteen (19) Plaintiffs who “wish to be flown from a third country to the United States for their court proceedings, understanding that . . . they will be detained upon arrival.” ECF No. 247 at 6. Counsel reported that all nineteen are currently in Venezuela. Since that filing, counsel have contacted and obtained the preferences of three more Plaintiffs who wish to pursue return, bringing the total in

this group to twenty-two (22). Two of those recently reached Plaintiffs are in Venezuela and one is located in a third country. Those three individuals' names are disclosed in the sealed filing.

Finally, Plaintiffs' counsel anticipates filing a further update as we continue to try to reach the approximately fifty(50) Plaintiffs for whom we have not yet been able to obtained their preference.

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Dated: March 9, 2026

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