

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SVITLANA DOE, *et al.*,

Plaintiffs,

– *versus* –

KRISTI NOEM, in her official capacity as Secretary
of Homeland Security, *et al.*,

Defendants.

Civil Action No.: 1:25-cv-10495-IT

PLAINTIFFS’ NOTICE OF DEFENDANTS’ ACTIONS REGARDING U4U

Plaintiffs respectfully submit this notice to alert the Court of recent actions of Defendants regarding Plaintiff Maksym Doe and other Ukrainians. Earlier today, Maksym Doe—who runs a nonprofit he started to provide aid in his home country and is here via Uniting for Ukraine (U4U), Maksym Doe Decl., Doc. No. 24-5—received an email (attached as **Exhibit A**) informing him that “[i]t is time to leave the United States.” The “Notice of Termination of Parole” says that “DHS is now exercising its discretion to terminate your parole,” effective “7 days from the date of this notice” unless “it expires sooner” by its own terms.¹ The letter concludes with a variety of admonitions about the civil, criminal, and immigration consequences of not departing, including this final warning: “Do not attempt to remain in the United States – the federal government will find you. Please depart the United States immediately.” Ex. A.

Plaintiffs’ counsel have received numerous reports throughout the day today that other Ukrainian members of the putative class—potentially thousands—have received an identical letter, including individuals with approximately two years left on their parole period. Earlier today,

¹ Maksym’s current parole period expires on its own terms in approximately two weeks. He has had separate applications for re-parole and Temporary Protected Status (TPS) pending for months. *See* Doc. 24-5 ¶ 17.

at 12:20 PM ET, Plaintiffs' counsel emailed Defendants' counsel a copy of Exhibit A and requested an explanation by 4 PM ET. Defendants' counsel emailed at 3:55 PM ET to say that they "have been looking into this" but "don't have any information to share yet."

Plaintiffs are submitting this notice now so that the Court will be aware of it before the hearing to address Plaintiffs' claims regarding the U4U program (among others) on the morning of April 7. *See* Order, Doc. No. 58.

Dated: April 4, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Esther H. Sung, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 4, 2025

/s/ Esther H. Sung
Esther H. Sung