

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

CIVIL ACTION NO.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

[REDACTED]

[illegible]

[illegible]

[illegible]

[illegible]

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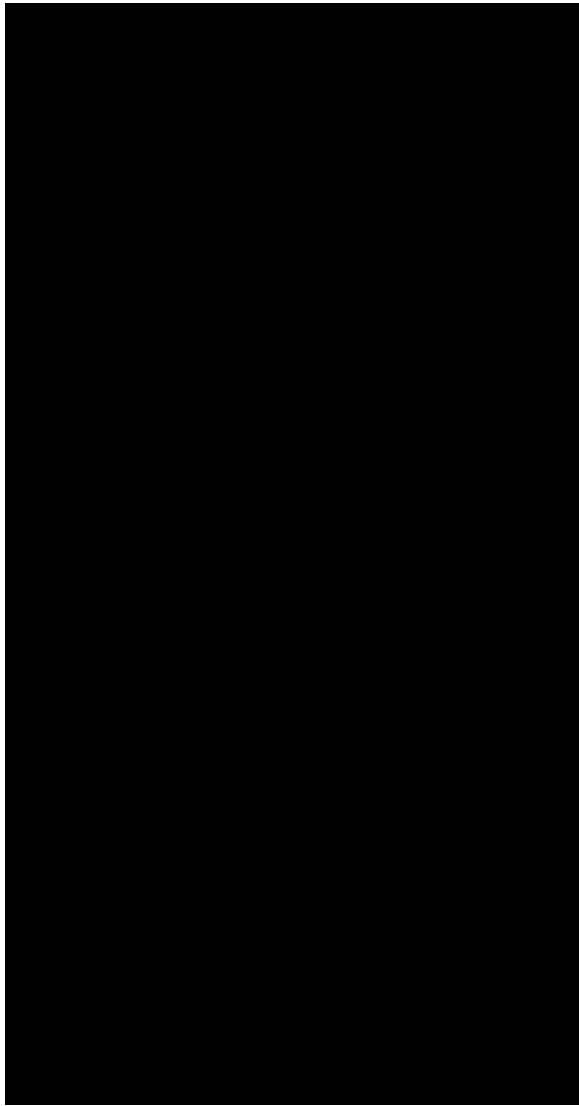
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Plaintiffs,

v.

Department of Homeland Security;

**U.S. Citizenship and Immigration
Services,**

Defendants.

I. INTRODUCTION

1. The U.S. Citizenship and Immigration Services (“USCIS”) has as its statutory mission, provided by Congress when it was created, to adjudicate immigration applications made in the interior of the United States. 6 U.S.C. § 271(b). For example, it is tasked with “[a]djudications of naturalization petitions,” “[a]djudications of asylum and refugee petitions,” and “[a]djudications of immigrant visa petitions.” *Id.* In describing its “Purpose and Background,” USCIS states that “[t]he Homeland Security Act created USCIS to enhance the security and efficiency of national immigration services by focusing exclusively on the administration of benefit applications. The law also formed Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) to oversee immigration enforcement and border security.”¹ It is, in all respects, an agency dedicated solely to the adjudication of immigration benefit applications made within the United States.
2. USCIS, however, recently taken upon itself a mission that falls outside of the scope of its authority, and indeed, one that runs directly contrary to the statutes, regulations, and policies that underly its purpose and operation. USCIS has now decided to “stop” the “flow” of noncitizens from countries that have been

¹ U.S. Citizenship & Immigration Servs., *Policy Manual* — Vol. 1, Part A, Ch. 1: Purpose and Background (last updated Nov. 3, 2025), <https://www.uscis.gov/policy-manual/volume-1-part-a-chapter-1>

determined to have high rates of visa overstays and fraud, which are found in two Presidential Proclamations imposing entry restrictions pursuant to 8 U.S.C. § 1182(f)—Presidential Proclamation 10,949 and 10,998.² USCIS is doing this to individuals from 39 countries through several policies: 1) an adjudicative, and indefinite, hold on nearly all immigration benefit applications for those from these identified high-risk countries; 2) a “re-review” of all benefit requests that have already been approved for individuals from these countries where those approvals were made on or after January 20, 2021; 3) a re-review of all policies and procedures under which these individuals had their benefit requests approved; and 4) a policy that treats “national origin” as a significant negative discretionary factor for citizens of each of those 39 countries as to whether to approve a given immigration benefit request.³

3. USCIS has taken what is solely and exclusively a ban on the *entry* of noncitizens into the United States via a Presidential Proclamation invoking 8 U.S.C. § 1182(f) and extended its reach into the interior of the United States. That statute

² U.S. Citizenship & Immigration Servs., Policy Alert PM-602-0194: Pending Applications—Additional High-Risk Countries (Jan. 1, 2026), <https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0194-PendingApplicationsAdditionalHighRiskCountries-20260101.pdf>

³ *Id.*; U.S. Citizenship & Immigration Servs., Policy Alert PA-2025-26: Impact of INA §212(f) on USCIS’ Adjudication of Discretionary Benefits (Nov. 27, 2025), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20251127-Discretion.pdf>

gives the President authority (not unlimited) to bar individuals from certain countries from entering the United States. But, after an entry has been made and the individual is in the United States, neither the President nor USCIS can use nationality as a basis for adjudicating applications. USCIS has not only abrogated its mission and purpose, but it has acted in excess of the President's authority that is limited to the suspension or restrictions on *entry* of noncitizens when specific criteria are met under § 1182(f). Left unchecked, USCIS will hold benefit requests in abeyance to “stop” the “flow” of noncitizens from certain countries. Domestic expansion of § 1182(f) has been universally struck down by all courts that have been faced with the issue. *See, e.g., East Bay Sanctuary Covenant v. Trump*, 932 F.3d 742 (9th Cir. 2018) (rejecting reliance on § 1182(f) where the policy “imposes the penalty on aliens already within our borders”). Similarly, nothing permits the President or an agency to override the Immigration and Nationality Act (“INA”) and Administrative Procedure Act (“APA”) to effectively, and explicitly, cease the processing of immigration benefit requests made domestically for arbitrary, capricious, and unlawful reasons.

4. Plaintiffs are noncitizens who have already been legally been admitted and entered the United States, possess valid immigration status, and have requested an immigration benefit from USCIS—whether that be a request to naturalize as

a U.S. Citizen, to adjust their status and receive an immigrant visa, thus becoming a permanent resident of the United States, to change or extend the nonimmigrant status that they currently hold, or to receive any number of ancillary immigration benefits, such as work authorization or international travel permission. Due solely to Defendants' unlawful expansion of § 1182(f) beyond entry to domestic benefit applications for those who have entered, the creation and application of discriminatory adjudicatory criteria, and the wholesale abdication of their roles in upholding and complying with the Immigration and Nationality Act, Plaintiffs now face an indeterminate wait on taking the next steps in their immigration journey, potential loss of employment as statuses expire and work authorization ends, and even the potential for removal proceedings to be initiated against them due to their status expiring while their benefit requests remain pending.

5. Because of these unprecedented, arbitrary, capricious, and unlawful acts by Defendants, Plaintiffs now bring this suit under the Administrative Procedure Act, 5 U.S.C. §§ 701–706, the Declaratory Judgment Act, 28 U.S.C. §§ 2201–2202 and the Constitution of the United States.

II. PARTIES

6. Plaintiff [REDACTED] is a citizen of Iran residing in Atlanta, Georgia. [REDACTED] has been assigned alien registration number

██████████. ██████████ i has a pending I-129 application with the receipt number IOE0934763639. Plaintiff ██████████ has a derivative family member with the following receipt number: EAC2690021368. Plaintiff has been recognized by USCIS for his nationally important medical research through approval of his National Interest Waiver. Both plaintiff and his spouse are physicians who rely on maintaining lawful status to exercise their professions and have suffered emotional and financial distress through this delay on their petitions.

7. Plaintiff ██████████ is a citizen of Iran residing in Johns Creek, Georgia. Mr. ██████████ has been assigned alien registration number ██████████. Plaintiff ██████████ has a pending I-485 under receipt number MSC2390395347 based on an approved approved EB-2 National Interest Waiver petition. Plaintiff ██████████ has a derivative family member with the following receipt number: MSC2490404819. Plaintiff ██████████ currently works as an Electrical and Computer Engineer with an expertise in artificial intelligence and high-speed optical networking and seeks to contribute to American technological innovation. However, without permanent resident status, he and his spouse are unable to make long-term decisions in their careers and family planning within the U.S.

8. Plaintiff [REDACTED] is a citizen of Iran residing in Atlanta, Georgia. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934394202. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934394201. Plaintiff [REDACTED] is currently a PhD student and is the sole potential income earner in her household. However, delays in her application processing have caused her household to face financial hardship. Additionally, the emotional distress and constant worrying for the future of her lawful immigration status have caused her to seek medical assistance and medication.
9. Plaintiff [REDACTED] is a citizen of Iran residing in Decatur, Georgia. Ms. [REDACTED] has an assigned alien registration number of [REDACTED]. Ms. [REDACTED] has a pending I-485 application with receipt number MSC2390154193. Plaintiff [REDACTED] faces significant financial hardship and emotional distress if her application is not adjudicated. Plaintiff [REDACTED] is currently completing a residency in medical physics and has devoted herself to cancer research.
10. Plaintiff [REDACTED] is a citizen of Zimbabwe residing in Marietta. Ms. [REDACTED] has a pending I-765 application with receipt number IOE9150000160. Plaintiff faces significant emotional distress if her application

is not adjudicated, due to uncertainty about her ability to begin working, which in turn threatens her future financial security.

11. Plaintiff [REDACTED] is a citizen of Iran residing in Peachtree Corners, Georgia. Plaintiff [REDACTED] has a pending I-485 with the receipt number IOE093445084; employment authorization application (Form I-765), and has an H1-B petition (Form I-129) filed on his behalf by his employer. His current legal status is employment authorization under STEM OPT, which will expire on September 4, 2026. Additionally, his H1-B petition was issued a Request for Evidence on December 17, 2025, citing his nationality as a negative factor requiring him to prove that positive factors outweigh this negative factor, despite submitting an approved I-140 national interest waiver (EB-2) as supporting evidence. The ban has thus directly impeded Plaintiff [REDACTED] [REDACTED] immigration processes and caused substantial emotional and financial hardship and uncertainty regarding his future status in the United States.

12. Plaintiff [REDACTED] is a citizen of Venezuela residing in Fayetteville, Georgia. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0931080789. While plaintiff's application's processing continues to be delayed, she is unable to work or renew her driver's license, which has placed a severe financial strain on her and her family both in the United States and

Venezuela. Additionally, the delay has prolonged her separation from her son and prevented her husband, a United States veteran, from meeting her family, causing deep emotional pain and disrupting essential family bonds. The delay in adjudication caused by the ban has inflicted significant emotional and financial hardship on Plaintiff [REDACTED]

13. Plaintiff [REDACTED] is a citizen of Iran residing in Oakwood, Georgia. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-129 petition under receipt number IOE9091498178. Plaintiff's current work authorization expires in June 2026 and without an approved petition, she will be forced to lose her job and leave the U.S.. This delay in adjudication is causing her significant emotional and financial hardship, as she has dedicated her educational career to preparing to teach graphic design to U.S. college students and will be deprived of the opportunity to pursue her career aspirations if her petition remains unadjudicated.

14. Plaintiff [REDACTED] is a citizen of Iran residing in Marietta, Georgia. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number MSC2590013577. Plaintiff [REDACTED] faces professional and personal hardship due to the ongoing disruption in adjudicating his application.

15. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with receipt number WAC2590149186. He also has a pending I-129 application with receipt number IOE9303230344. Plaintiff [REDACTED] is an Assistant Professor of Economics and serves as the coordinator of the College of Business Graduate School at [REDACTED]. If his application is not adjudicated, Plaintiff [REDACTED] will lose work authorization, causing significant financial and emotional hardship for himself, his family, and his employer. Furthermore, his pending immigration status prevents him from renewing or obtaining a driver's license, limiting his ability to commute and perform his professional duties.

16. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Mrs. [REDACTED] has a pending I-485 application with the receipt number MSC2590608372. Plaintiff [REDACTED] is a derivative applicant based on her husband's I-485, which was approved August 13, 2025. Plaintiff [REDACTED] faces the potential of loss of her job and educational opportunities due to the ban on adjudicating her application. She and her husband are having emotional and practical hardship as they face ongoing strain and uncertainty on their living arrangements and long-term stability.

17. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with the receipt number IOE0932463632. Plaintiff [REDACTED] has an approved EB-2 National Interest Waiver recognizing his contributions to U.S. clean energy research. His case is subject to adverse discretionary treatment based solely on his nationality and is causing significant professional and emotional hardship to him and his family.

18. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with the receipt number IOE0932282113. Plaintiff [REDACTED] is expected to graduate with his Ph.D. in June 2026 and is limited in professional opportunities due to his pending case due to the ban of adjudication. This situation has caused him emotional and professional distress as he has been unable to travel to see his family in three years and worries about his ability to secure employment in the future.

19. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has several pending applications with USCIS that are directly impacted by the ban on adjudication, including a STEM OPT I-765 application under premium processing with receipt number IOE9244285824, an H-1B I-129 petition under

premium processing with receipt number IOE0931793595, and an EB-1 I-140 petition under premium processing with receipt number IOE0935015121. Plaintiff [REDACTED] is currently on unpaid leave after his employer, [REDACTED], noticed that his work authorization had expired and informed him that his employment would be terminated if he did not receive lawful status by the last week of May 2026. Plaintiff currently faces the risk of losing his job and the emotional distress that this situation has placed upon him.

20. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with the receipt number IOE0933214390. Plaintiff [REDACTED] is a researcher and university instructor, and the unresolved status of his employment authorization has disrupted his ability to commit to projects and collaborations. This delay is disrupting his ability to pursue developing research initiatives, embark on business ventures, and prepare competitive grants, negatively impacting his professional and personal development.

21. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with the receipt number IOE0934049425. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934049423. Plaintiff and his wife face the potential of loss of their current

professional aspirations and future employment. Plaintiff is currently in the process of earning his PhD and remains fearful that his department will no longer provide financial support. The constant worry for his professional future has caused great emotional distress and financial hardship.

22. Plaintiff [REDACTED] is a citizen of Afghanistan. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Mr. [REDACTED] has several pending applications with USCIS, including an asylum application with receipt number LGL2690021152, an I-130 marriage-based petition with receipt number IOE9604947211, and a Re-Parole application with receipt number IOE9829510034. Plaintiff's professional career is at risk as his work authorization has expired and his renewal application is currently pending as a result of the adjudication due to the ban. His fear of losing his professional and financial momentum has caused him significant emotional hardship.

23. Plaintiff [REDACTED] is a dual citizen of Iran and Turkey. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0932278565. Plaintiff is a highly regarded research fellow in oncology and critical cancer care and wishes to continue her education through residency programs of Internal Medicine in the United States. The current adjudication of her adjustment of status application

has placed her under distress as she wishes to further her career but must await further decisions to enroll in a program under an H-1B visa.

24. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number MSC2590015725 and an OPT application with receipt number IOE9353543887. Plaintiff [REDACTED] recently graduated with a PhD in December and has F-1 status for the time being. However, she had to leave her part-time job due to her application being caused and has no further way to sustain herself. Ms. [REDACTED] risks homelessness and faces emotional and financial hardship due to these delays.

25. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with receipt number IOE0934209493 and a pending I-765 with receipt number IOE0934209494. Plaintiff [REDACTED] is facing significant emotional and practical hardship through these delays. He has been unable to plan the future of his career and future within the country comfortably as the future of his residence is uncertain.

26. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with receipt number IOE0934405069 and a pending I-765 with receipt

number IOE0934405070. Plaintiff's ability to work and maintain his career depends on his processing applications, meaning that any delay would negatively impact his ability to sustain himself financially. Plaintiff [REDACTED] lives in constant emotional distress that the further delay in his applications will place his life in jeopardy.

27. Plaintiff [REDACTED] is a citizen of Iran.

Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0934045541. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934045539. Plaintiff [REDACTED] is currently a PhD candidate engaged in multiple NIH-funded research projects surrounding substance use disorders and mental health stigma. He has received competitive fellowships and funding to support his work; however, his professional future depends on the processing of his applications.

28. Plaintiff [REDACTED] is a citizen of Nigeria. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0920630004. Plaintiff [REDACTED] is an airline pilot and holds an FAA license. His career within the United States depends on him having lawful permanent resident status to work in his field. The delay of

his applications places him in professional and financial uncertainty, causing him significant distress for his future.

29. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with receipt number IOE0934556955. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934556957. Plaintiff [REDACTED] is currently pursuing her PhD through extensive study and research. However, she remains uncertain about her future employment since her work authorization is set to expire within the next year, and the delays grant her uncertainty of her future. Additionally, she has been unable to see her family for five years due to these processing delays and faces emotional distress as a consequence of their prolonged separation.

30. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application with receipt number IOE9505477086. Plaintiff [REDACTED] is currently an international student and has a confirmed job offer starting December 21, 2025. However, without an employment authorization document, he risks losing this employment opportunity and a source of financial support. This delay in the processing of his application has caused him emotional distress as she is unsure of his future career and fears being unable to afford rent and living expenses.

31. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0934306129. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934306129. Plaintiff [REDACTED] is currently a Research Scientist at the [REDACTED]; however, his future employment is at risk if he does not receive a renewed employment authorization document. Additionally, this delay in the processing of his application causes him and his spouse to distress as they consider the future of their financial and employment stability.

32. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with receipt number IOE0934852159, an I-485J with receipt number IOE0934852160, an I-765 with receipt number IOE0934852161, and an I-131 with receipt number IOE0934852162. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: IOE0934852156, IOE0934852157, and IOE0934852158. Plaintiff [REDACTED] is currently a Senior Scientist at [REDACTED] [REDACTED] and the mother to a 10-month-old baby. She and her spouse fear the processing delays of their applications, as it would risk their employment and the future development of their family within the country.

33. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-140 application with receipt number IOE-839-58-64704. Plaintiff [REDACTED] is currently an Assistant Professor in the Department of Architecture at [REDACTED]. Due to a processing freeze coinciding with his priority date becoming current, Plaintiff [REDACTED] faces significant hardship, as the delay may prevent him from filing for adjustment of status during the limited period when visa numbers are available. Plaintiff [REDACTED] faces significant employment and emotional distress as he is unsure of his ability to maintain his employment and remain within his professional community.

34. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0932292016. Plaintiff [REDACTED] currently has valid F-1 status but fears the future of his and his family's financial stability in the future. The fear of denial causes severe personal, emotional, and practical hardship.

35. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number A241230502. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0933080473. Plaintiff [REDACTED] lack of permanent status has restricted her access to job materials due to her ability to

travel and access resources. Additionally, while she is currently employed under H-1B status, this does not assure her continued employment within the U.S.

36. Plaintiff [REDACTED] is a citizen of Sierra Leone. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 under receipt number IOE0928902082. Plaintiff [REDACTED] has experienced significant emotional distress and anxiety, especially about his future, as his applications are being delayed.

37. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 under receipt number IOE0934099824. Plaintiff [REDACTED] currently works in the U.S. hardware and semiconductor manufacturing industry; however, due to his processing delays, he has not been able to travel internationally to attend conferences and has been unable to collaborate with researchers in his field. This delay in processing times places [REDACTED] at a professional disadvantage and places his career at risk.

38. Plaintiff [REDACTED] is a citizen of Malawi. Plaintiff [REDACTED] has a pending I-129 application under receipt number IOE8801810111. Plaintiff [REDACTED] is the CEO and founder of [REDACTED]. A company developing tools for superhuman intelligence. The future of his career and company are being hindered by his inability to open a new office and hire team members due to the delay in

application processing. Ms. [REDACTED] business plans and future career are being significantly impacted by the ban on adjudicating his petition.

39. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0932543058 and an I-765 under receipt number IOE0932543059. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: IOE0932543055, IOE0932543056, and IOE0932543057. Plaintiff [REDACTED] currently works as a Postdoctoral Research Associate; however, his employment authorization will expire in May 2026. Without processing of his applications, he will not be allowed to be within the U.S. and will lose both financial and career opportunities. With his and his spouse's financial obligations and housing, financial stability is essential to the continuation of their U.S. residence.

40. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application with receipt number IOE9771920003. Plaintiff [REDACTED] recently completed her PhD in Industrial and Systems Engineering at [REDACTED], where she conducted critical research projects integral to her academic training and ongoing studies, including work related to Parkinson's disease. However, due to the adjudication of her application and her lack of work authorization, she

is unable to secure a job position in her field. This impacts her professional development and her capacity to contribute to her field.

41. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-765 application under receipt number IOE0934272114 and an I-485 application under receipt number IOE0934272113. Plaintiff [REDACTED] is a physician-researcher specializing in cardiovascular science and requires timely adjudication to secure research positions to further her professional career. Due to the delay in processing applications, she is unable to secure such a position and risks financial and emotional strain due to the uncertainty surrounding her immigration status.

42. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934281709. Plaintiff [REDACTED] currently works at a research lab at the [REDACTED] under her H1-B status. However, plaintiff worries for the future of her employment as she is not allowed to transfer to private-sector employers and worries about financial hardship as a consequence. Additionally, plaintiff is currently unable to visit her spouse in Canada due to the travel restrictions, furthering her emotional distress.

43. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934393795. Plaintiff [REDACTED] has previously received an I-140 National Interest Waiver recognizing her research in healthcare finance, artificial intelligence, biodiversity risk, and climate change. However, the pending application and its adjudication have left her unable to work and advance in her career. This lack of direction and opportunity is causing her severe professional and financial harm, as well as emotional distress.

44. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number MSC2490054792. The adjudication of his application has caused plaintiff significant emotional and professional hardship. Plaintiff has lost job opportunities and has faced significant delays compared to other applicants.

45. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0932740158. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932740156. Plaintiff [REDACTED] currently works as a physician-scientist

and plans to begin his medical residency throughout the duration of his J-1 visa program. Following the end of his student status, plaintiff aspires to continue contributing to this scientific space but does not have assurance that his applications will be processed. This causes him and his spouse distress as they do not know the future of their professional nor financial trajectory.

46. Plaintiff [REDACTED] is a citizen of Iran. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934185165. Plaintiff has maintained F-1 student status since 2019 and has been patiently waiting for his priority date to become current. However, the delay in his application processing has caused irreparable emotional, financial, and physical hardship as he faces uncertainty surrounding his future.

47. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-130 application with receipt number IOE9674145908, an I-485 application under receipt number IOE0933426719, and an I-765 application under receipt number IOE0933426720. Plaintiff has been a lawful resident of the United States for eight years, following all processes to be able to study, work, and drive. Recently, her employment authorization document expired, and she has been left unable to work. Though her employer is ready to rehire her once she receives a

new work permit, she has been left unable to financial sustain herself causing financial and emotional distress.

48. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-140 application under receipt number IOE0931586407. Plaintiff [REDACTED] is currently completing research work and concentrates on studying for medical board examinations. However, with an uncertainty for her future status within the U.S., she is in emotional and professional distress.

49. Plaintiff [REDACTED] is a citizen of Libya. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-290 application under receipt number IOE0932654211. Plaintiff [REDACTED] has a derivative family member with the following receipt number: WAC2590158975. Mrs. [REDACTED] has experienced significant emotional and financial hardship due to the uncertainty and delay in adjudication.

50. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-140 application under the receipt number IOE0928270580. Plaintiff [REDACTED] has three derivative family members with the following shared receipt number: IOE0928270580. Plaintiff [REDACTED] is currently interviewing with major companies, such as Google, but is limited to using OPT verification. This limitation in employment opportunities severely limits his

professional capabilities and trajectory. Additionally, Mr. [REDACTED] and his family have suffered from uncertainty of their status and future within the country.

51. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under the receipt number IOE0932297737. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932297738. Mrs. [REDACTED] is currently a student under F-1 status and relies solely on her student stipend for income. The financial stress that her and her spouse are currently undergoing has caused her severe emotional distress.

52. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under the receipt number IOE0934341451. Plaintiff [REDACTED] has started a family with his spouse within the U.S. and began making plans to establish his life within the country; however, his plans have been rearranged as the adjudication of his application has delayed its processing. He and his wife are uncertain of the future of their financial and living situation, causing both of them emotional distress.

53. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number, [REDACTED] Plaintiff [REDACTED] has a pending I-485

application under receipt number IOE0934484127. Plaintiff [REDACTED] is a board-certified cardiologist and cardiology clinical research fellow at the [REDACTED], working on a major NIH-funded project. Her ability to access career opportunities and clinical research largely depend on her ability to receive permanent resident status. This loss of career and job opportunities, as well as her prolonged separation from her family have placed her in a state of severe emotional distress.

54. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-765 under receipt number IOE9441780523, an I-140 under receipt number IOE0933963152, and an I-290B appeal under receipt number IOE0933713916. Plaintiff [REDACTED] is currently working as a Research Assistant at [REDACTED] and depends on receiving a renewed work authorization document to continue her employment. This risk of losing professional opportunities, as well as the safety concerns surrounding her possible relocation to Iran, based on her minority ethnicity, have caused her severe emotional distress.

55. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending applications under the receipt numbers IOE0934123340 and IOE0934123341. Plaintiff [REDACTED] currently works as a physician and postdoctoral research

fellow at [REDACTED] and her research focuses on translational research to improve outcomes for kidney diseases. She has previously been granted an I-140 petition under the EB-2 National Interest Waiver category; however, with the delay in her application processing, she is unable to enroll in pathology residency training to further her career. Both her professional and personal trajectory are being disrupted as she is unable to establish future plans with her partner with the uncertainty of her future.

56. Plaintiff [REDACTED] is a citizen of Syria. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under the receipt number IOE0932541490. Plaintiff [REDACTED] is currently pursuing a PhD and has been previously granted an I-140 National Interest Waiver petition, recognizing that his research in artificial intelligence serves the national interest. As plaintiff approaches the end of his doctorate and with the delays being caused to his application, he is experiencing significant emotional hardship and uncertainty about his future and his career following graduation.

57. Plaintiff [REDACTED] is a citizen of Haiti. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 under receipt number IOE0930635131. While plaintiff currently holds temporary protected status, the processing delays place her at risk of

continuing without TPS in the city of Chicago, a city with a heavy presence of immigration enforcement officers. Plaintiff is responsible for supporting her partner, mother, and sister and risks being unable to do so through further delays, causing her emotional and practical distress.

58. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-765 application under receipt number IOE9150379266. Plaintiff [REDACTED] has suffered both practical and emotional hardship through the processing delay of her application and the uncertainty of her future. Ms. [REDACTED] fears losing her employment, health insurance, and employment-based benefits; additionally, her relationship has been strained as she is unable to concretely plan a future with her partner.

59. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934217313. Plaintiff [REDACTED] has been offered a scientist position at [REDACTED] and is being granted a large amount of federal research funding for cancer research but has not been able to accept the offer in fear that he will no longer have lawful immigration status. Additionally, his future with his U.S. partner has been placed

on pause due to the uncertainty of his immigration status and the impact that it will have on both his professional career and personal life.

60. Plaintiff [REDACTED] is a citizen of Burma. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934489007. Plaintiff [REDACTED] made plans for his professional trajectory following graduation and has made critical family and financial decisions. Unfortunately, the delay has impeded his receipt of employment authorization, creating uncertainty surrounding the future of his job and internship opportunities.

61. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registrtration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934064799 and an I-131 under receipt number IOE0934064801. Plaintiff [REDACTED] is currently a PhD student and is uncertain whether to pursue post-graduation employment opportunities with her uncertain lawful immigration status. Additionally, her prolonged separation from her family has caused her emotional distress, contributing to her distress at this time.

62. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-140 application under receipt number IOE0927423731. Plaintiff [REDACTED] has had his career

disrupted due to the processing delay of his application. Additionally, plaintiff faces emotional distress as he considers the possibility of a forced departure after years of lawful presence and professional contribution in the U.S..

63. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934171895. Plaintiff [REDACTED] has completed his PhD and has worked in highly specialized engineering roles that directly support U.S. industries. However, through processing delays, his ability to seek career opportunities has been limited for they seek candidates with permanent residency. Additionally, he has been unable to visit his parents in nearly a decade, contributing to his emotional and professional distress.

64. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934099076. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934099074. Plaintiff [REDACTED] is currently in the process of completing his PhD and works in the materials and aerospace engineering sector; however, his career prospects have diminished as companies such as Boeing and General Motors require applicants to have a Green Card. Mr. [REDACTED] is facing emotional and financial hardship as he has been limited

to a few internship opportunities that do not require applicants to have Green Cards.

65. Plaintiff [REDACTED] is a dual citizen of Iran and Canada. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934025707. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934025704. Mr. [REDACTED] works in the aerospace industry where permanent resident status is required for certain projects, meaning application processing delays are limiting his professional capacity. Additionally, his family has been established within the U.S. and as his eldest child prepares to enter Kindergarten, the uncertainty of his immigration status causes severe emotional distress.

66. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934107258. Plaintiff [REDACTED] is a PhD graduate and depends on timely adjudication to maintain lawful work authorization. The delay in his application processing has caused uncertainty and restricts his employment options, creates income instability, and prevents him from planning his professional future.

67. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934050200. Plaintiff [REDACTED] has earned a PhD and has contributed to the community over the past five years. He risks losing his job if he is not granted a Green Card by the time his work authorization expires. The delay in his application processing has caused him emotional and financial hardship as he recently purchased a home and has been unable to visit his family in five years.

68. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934851445. Plaintiff [REDACTED] currently works at the [REDACTED] and risks losing a significant performance bonus and the inability to pursue a postdoctoral position at the [REDACTED] through the delay in the processing of his application. Additionally, as a family of three, he fears being unable to financially sustain solely on his wife's PhD stipend, causing them emotional and financial hardship.

69. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0929700338. Plaintiff [REDACTED] is an AI researcher and is actively seeking employment but is limited in opportunities due to his lack

of a Green Card, not allowing him to access Optional Practical Training. This has resulted in uncertainty for his professional future, as well as financial hardship and emotional distress.

70. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934054409. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934054407. Plaintiff [REDACTED] currently holds temporary employment authorization under his F-1 status but risks being unable to pursue other long-term professional and internship opportunities in the future without stable employment authorization. Additionally, plaintiff and his spouse have been unable to visit their family in five years, causing them additionally emotional distress.

71. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934057107. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934057110. Plaintiff [REDACTED] fears losing her lawful immigration status and being without work authorization, especially considering her career, housing, and family

decisions. Additionally, she is currently pregnant and fears the uncertainty that the future of her status entails for her family and their future plans.

72. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934569787. Plaintiff [REDACTED] is finishing his last semester of his PhD program and has not been granted employment authorization, leaving him unable to plan his professional career. This uncertainty has created financial and emotional hardship for plaintiff.

73. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9308655471. Plaintiff [REDACTED] applied to pursue a PhD in Computer Science with a focus on Artificial Intelligence during the OPT period following graduation; however, the delays in processing of applications has forced him to risk losing the job opportunity which he worked hard to secure. This has caused plaintiff emotional distress, resulting in him consulting a mental health professional for his benefit.

74. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934648626. Plaintiff [REDACTED] has a derivative family member with the following receipt number:

IOE0934648624. Mr. [REDACTED] had a confirmed job offer meant to start on January 5th, 2026, but due to the processing delays, his work authorization was not issued in time causing his employment offer to be rescinded. He is projected to have suffered a \$70,000 financial loss due to this situation, causing him and his spouse significant financial and emotional distress.

75. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9071153677. Plaintiff [REDACTED] currently benefits from an automatic extension to his Optional Practical Training but if his work authorization is not approved and issued before June 2026, he will be forced to cease employment. This is of concern for him and his long-time partner as they try to create financial stability and a professional future in the country.

76. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934395141. Plaintiff [REDACTED] currently suffers from emotional distress surrounding his limited work authorization and his inability to plan for his future. Additionally, he has been separated from his family for a prolonged period of time, increasing his distress overall.

77. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED]

currently has a pending I-485 application under receipt number IOE0934095933. Plaintiff [REDACTED] is currently a student seeking to complete his medical residency; however, the delays in processing his application are interrupting his ability to maintain legal immigration status. This delay places his career and financial capabilities in jeopardy, causing him emotional and financial distress.

78. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has an I-765 application under receipt number IOE9549089639. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE9549089639. Mrs. [REDACTED] has an employment opportunity planned but cannot start without a valid employment authorization document. She has continuously maintained lawful status but is in emotional distress due to the delays in application processing and the threat they pose to her financial and professional well-being.

79. Plaintiff [REDACTED] is a citizen of Syria. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has an I-485 application processing under receipt number IOE0934835528. Mr. [REDACTED] currently has work authorization, but it is set to expire in June 2026. Without authorization, he will be forced to stop working, resulting in financial hardship. Additionally, he and his spouse had planned to purchase a home, but those plans

are on hold due to the uncertainty of his immigration status causing emotional distress for plaintiff.

80. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED]i has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932636735. Mr. [REDACTED]i has maintained eight years of continuous, lawful residence in the U.S.. The delay in adjudication of his application due to the ban has caused him emotional hardship, financial hardship, and family separation.

81. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934329596. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: IOE0934329599, IOE0934329601, and WAC2590139161. Mr. [REDACTED] had employment authorization which expired in July 2025 causing him to stop working. Additionally, he is responsible for the financial well-being of his ailing father, suffering from Stage IV cancer, and is unable to meet that responsibility. This inability to support nor visit his father has left plaintiff feeling severe emotional distress.

82. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-

485 application under receipt number IOE0932440063. Ms. [REDACTED] has uncertainty surrounding her immigration status and her future ability to plan to enroll in a residency program for the further progression of her academic and research career. Additionally, Ms. [REDACTED] has been unable to visit her family in over two years, furthering her emotional distress at this time.

83. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932460002, a pending I-765 with receipt number IOE0932460003, and a I-131 with receipt number IOE0932460004. Plaintiff [REDACTED] is currently employed as a postdoctoral associate at the [REDACTED]; however, her future professional planning has been placed in jeopardy as she does not have long-term work authorization due to processing delays. With her career development in pause, plaintiff has suffered from emotional and practical distress.

84. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application under receipt number IOE9411535503. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934196712. Mr. [REDACTED] has filed an I-140 petition for his wife to be able to receive a work authorization document. However, due to the delays, Plaintiff [REDACTED] has suffered hardship.

85. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has an I-485 application pending under receipt number IOE0932178100. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932178102. Mrs. [REDACTED] conducts critical Alzheimer's disease research and currently holds postdoctoral employment in that sector. However, Mrs. [REDACTED] future professional and academic career is in danger due to her inability to apply for research funding and to travel to conferences in which she would present her research due to her lack of permanent status. She is currently undergoing significant emotional and professional distress.

86.74 [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has a pending I-765 application under the receipt number IOE9764329579. Plaintiff [REDACTED] graduated in December 2025 and had a job offer start date of January 12, 2026; however, due to processing delays, she has been uncertain whether she will be able to begin the job as scheduled. This delay is causing plaintiff significant professional and financial distress.

87. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-140 application under receipt number IOE0930504963. Mr. [REDACTED] faces delays that have negatively impacted his immigration process.

88. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0935115070. Plaintiff [REDACTED] is currently employed as a scientist at a major pharmaceutical company. The currently delay in application processing poses a threat to her career, stability, and future in the U.S.

89. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has an I-485 application pending under receipt number IOE0932258529. The delay in the processing of his application has hindered his ability to plan long-term professional opportunities, travel internationally, and make stable personal and financial decisions.

90. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9219861843. Mr. [REDACTED] is currently completing his PhD; however, this delay in processing times has bit allowed him to make binding commitments for the furthering of his professional career. The prolonged uncertainty and delaying of major life decisions are causing him great emotional and practical distress.

91. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff Bazmi currently has a pending I-485 application under receipt number IOE0932433625. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932433627. Mr. [REDACTED] is currently in the process of completing his PhD; however, with the delay in the processing of his application, the future of his career is uncertain as many employers require candidates to have permanent resident status. Mr. [REDACTED] is suffering from significant financial and professional distress as his professional opportunities may remain limited.

92. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number MSC2490848352. Mr. [REDACTED] was interviewed but has yet to receive a decision on his application, leaving him in a state of significant emotional distress as he awaits a response regarding his immigration status.

93. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has a pending I-140 application under receipt number IOE0928405298. Mrs. [REDACTED] and her husband conduct research that benefits the improvement of treatments for children with rare diseases. Unfortunately, the prolonged delay of their applications is causing substantial emotional and financial hardship,

threatening their ability to continue their important research and maintaining their family's stability.

94. Plaintiff [REDACTED] is a citizen of Nigeria. Plaintiff [REDACTED] currently has a pending I-765 under receipt number IOE9708025695. As a result of the delay, Plaintiff [REDACTED] suffers emotional and financial hardship, including an inability to apply for jobs or earn income, increasing loan payments, and the risk of falling out of status and being separated from his family. These adverse effects have caused significant disruption to his life and well-being.

95. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9608987842. Ms. [REDACTED] is currently trying to enroll in a PhD position; however, due to the delay in processing, her SEVIS record could not be transferred. She currently has no source of income and faces the possibility of homelessness and worsening health conditions following surgery requiring ongoing care and a lack of healthcare coverage.

96. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932671327. Ms. [REDACTED] lives in a state of anxiety as she fears that her employment is at risk of termination due to her Iranian citizenship. Additionally, she has not been able

to see her family in six years, increasing her emotional distress to the point where she has had depression, suicidal thoughts, and needs antidepressant medication.

97. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt numbers IOE0934161241 and IOE0934161242. Ms. [REDACTED] is currently an ophthalmologist whose ability to work largely depends on her employment authorization document and lawful permanent resident status. Unfortunately, she has already lost several job opportunities due to the uncertainty surrounding her EAD and will not be able to begin her fellowship without the processing of her application.

98. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934089727. Mr. [REDACTED] will soon be graduating from his PhD program and requires a work authorization document to begin employment. Unfortunately, plaintiff has already lost several job offers and financial resources as his immigration status remains unknown.

99. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932296397. Plaintiff [REDACTED] has a derivative family member with the following receipt number:

IOE0932296395. Mr. [REDACTED] currently works as a Data Scientist for [REDACTED], and he has experienced significant emotional distress as he and his spouse are unsure of their professional future within the country. The prolonged delay in adjudication has imposed significant emotional, professional, and personal hardship.

100. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 under the receipt number IOE0934537052, an I-765 under receipt number IOE0934537053, and an I-131 under receipt number IOE0934537054. Mr. [REDACTED] is currently a healthcare researcher engaging in projects related to HIV, juvenile idiopathic arthritis, and Alzheimer's disease. Unfortunately, with his OPT period coming to an end, he is unable to continue his research and collaborate with other researchers in projects. Additionally, Plaintiff [REDACTED] faces serious financial hardship without lawful income to cover essential living expenses, compounded by emotional distress due to the uncertainty surrounding his legal ability to work

101. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934113500. Ms. [REDACTED] has previously been granted a National Interest Waiver for the value of her work in educational research using advanced statistical and data science methods. This delay has

caused significant emotional, professional, and financial hardship, including anxiety, instability, and uncertainty that restrict her ability to plan long-term research projects, accept future appointments, and fully engage in collaborations that benefit U.S. institutions and the broader research community.

102. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9647481320. Mr. [REDACTED] was offered a postdoctoral research associate position lasting through January 2027; unfortunately, due to the delay in processing, he risks ending the appointment less than three months into the position. His professional future is at risk as his current work authorization reaches its expiration date causing financial and professional distress.

103. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 under receipt number IOE0934143401. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934143399. Mr. [REDACTED] has experienced significant emotional hardship and financial stress, primarily due to prolonged uncertainty about his employment and the inability to make stable, long-term plans. With his H-1B status expiring in July

2026, the pause in processing his green card application has created serious uncertainty about his future employment authorization.

104. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently has a pending I-140 petition under receipt number IOE0927020997. Mr. [REDACTED] PhD program ends in August 2027, and several faculty members have strongly expressed their support for his future as a faculty member, as well. Unfortunately, with the delays in processing, if his I-20 expires before his applications are processed, he will lose the opportunity to join and contribute to the academic community. This, as well as the future of his spouse, has caused plaintiff to suffer from emotional and professional distress.

105. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-140 application under receipt number IOE0924483289. The uncertainty surrounding Ms. [REDACTED] immigration status has forced her to decline valuable career opportunities and has hindered her professional growth. Additionally, her inability to leave the country has complicated her grieving process through the loss of her father and the fear of losing another family member without being able to say good-bye.

106. Plaintiff [REDACTED] is a citizen of Iran. Mrs. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED]

currently has a pending I-485 application under receipt number MSC2490050750. Plaintiff [REDACTED] has a derivative family member with the following receipt number: MSC2490050753. Mrs. [REDACTED] is a head and neck surgeon and is highly specialized and critically needed in her medical field. Unfortunately, the delay in her application has interfered with her ability to obtain full medical credentials, secure hospital privileges, and lawfully continue her medical practice. These interventions in her professional aspirations have caused significant emotional and professional distress.

107. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE9025081148. Mr. [REDACTED] holds a PhD in Civil Engineering and has contributed numerous federal and state projects focused on water resources management and flood risk mitigation in Texas. Plaintiff currently has an 180-day automatic extension, allowing him to continue using his employment authorization; however, once that extension expires, he will no longer be allowed to work and will force him into financial distress.

108. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932233413. Plaintiff [REDACTED] has a

derivative family member with the following receipt number: IOE0932233415.

Mr. [REDACTED] conducts research regarding Acute Myeloid Leukemia and will soon be ineligible to apply for fellowship funding necessary to continue his research. The delay in his application processing is disrupting both his academic and personal life.

109. Plaintiff [REDACTED] is a citizen of Haiti. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-765 application under receipt number IOE0934655574. Ms. [REDACTED] currently works under Temporary Protected Status; however, once her status expires, she will not be able to work until she is issued another work permit. This situation has placed her in emotional distress as she fears the need to relocate to Haiti due to the danger and persecution that occurs in the country.

110. Plaintiff [REDACTED] is a citizen of Venezuela. Ms. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934694456. Plaintiff [REDACTED] has been inside the U.S. since 2009 and currently works at [REDACTED] in generative AI and cybersecurity. The prospect that she may return to Venezuela has caused her significant emotional distress as she fears the collapsed economy and dictatorship within the country.

111. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0932654654. Mr. [REDACTED] relies on temporary work authorization despite having an approved National Interest Waiver. The delay on his application processing has negatively impacted his capacity to maintain job security, causing plaintiff emotional and financial distress.

112. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 petition under receipt number IOE0932542726. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932542728. Mr. [REDACTED] is a final-year PhD candidate in Civil Engineering at the [REDACTED] [REDACTED] with an expected graduation date of May 2026; however, despite his extensive teaching and research experience, his professional plans have been put on hold as he is unable to concretely determine the future of his professional career and contributions to the sphere without permanent residency.

113. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned alien registration number of [REDACTED]. Mr. [REDACTED] has a pending I-485 application with the receipt number IOE0934229453; I-131 application with a receipt number IOE0934229455; I-765 application with a

receipt number IOE0934229454. Plaintiff faces the potential loss of job opportunities if his application is not adjudicated; Plaintiff [REDACTED] is a doctoral candidate at the [REDACTED], where he has contributed to federally funded research projects and has published multiple first-author, peer-reviewed articles. However, he cannot begin employment after graduation without USCIS adjudicating his applications.

114. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] is the petitioner of multiple pending immigration applications, including an EB-1A petition, an EB-2 NIW petition, and an F2A petition with a receipt number IOE9613757326, along with a corresponding I-485 with a receipt number IOE0930055370. Plaintiff has not seen her father for approximately nine years and faces severe emotional hardship due to prolonged family separation and professional and financial uncertainty if her applications are not adjudicated.

115. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-765 application with receipt number IOE9215544452. Plaintiff's job offer from Tesla was rescinded due to his application not being adjudicated. Plaintiff [REDACTED] is a Ph.D. graduate in Electrical Engineering at [REDACTED]. Plaintiff faces significant financial hardship and uncertainty regarding his immigration status and future employment if his application is not adjudicated.

116. Plaintiff [REDACTED] is a citizen of Venezuela. Mr. [REDACTED] has a pending I-130 and I-485 applications with receipt numbers 10E0934498908 and 10E0934498907. Plaintiff [REDACTED] faces extreme emotional stress and financial instability if his applications are not adjudicated

117. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 application with receipt number IOE0927609203. Plaintiff [REDACTED] faces significant emotional and financial hardship if his application is not adjudicated.

118. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 application with receipt number IOE0927358685. Plaintiff [REDACTED] faces significant emotional and financial hardship if her application is not adjudicated. Plaintiff [REDACTED] holds a master's degree in Emergency Management and a PhD in Nursing. She is employed as a nurse and serves as an adjunct assistant professor, educating nurses and actively conducting research.

119. Plaintiff [REDACTED] is a citizen of Benin. Mr. [REDACTED] has an assigned alien registration number of [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application with receipt number IOE9335712748. Plaintiff [REDACTED] faces significant emotional distress and anxiety if his application is not adjudicated. The delay has hindered his ability to plan for the future, restricted his international travel to visit his children abroad, limited his professional

advancement opportunities that require U.S. citizenship, and prevented him from fully participating in civic life, including voting.

120. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with receipt number IOE0932400265, as well as a related I-765 application with receipt number IOE0932400266 and I-131, receipt application with receipt number IOE0932400267), and I-765 STEM OPT application with receipt number IOE9799003857. Plaintiff [REDACTED] current work authorization expires on January 28, 2026, and if his pending work authorization is not adjudicated by that date, he faces the risk of losing his job and sole source of income, resulting in severe financial hardship. Mr. [REDACTED] holds a Ph.D. in Electrical Engineering. Moreover, the delay has prevented him from traveling internationally to visit his family, including his parents, whom he has not seen for over seven years, causing significant personal and emotional hardship.

121. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has multiple pending applications with USCIS, including an I-765 (for F-1 Post-completion OPT), an I-485, and accompanying I-765 and I-131 applications, with receipt numbers IOE9539413883, IOE0935017377, IOE0935017378, and IOE0935017379. As a highly trained researcher specializing in AI-driven protein design for cancer therapy, Plaintiff [REDACTED] completed his master's and

doctoral training in Chemistry and held a high-compensation technical role aligned with his expertise. Due to the delay in processing his OPT application, he lost his work authorization and was terminated from his position, resulting in significant professional, financial, and emotional hardship. The delay has also caused material harm to his U.S. employer, which invested substantial resources in recruiting and training him for a highly specialized role critical to cancer research and U.S. national security interests.

122. Plaintiff [REDACTED] is a citizen of Venezuela by birth and also holds Canadian citizenship. He has a pending I-129 application with receipt number IOE8471468882. He faces significant financial hardship if his application is not adjudicated, as he is unable to fulfill contracts in the United States. His application has been paused due to his Venezuelan birth, despite having no ties to Venezuela since moving to Canada at age ten and holding only a Canadian passport. Plaintiff [REDACTED] is a professional specializing in Lighting Design and Programming, with over 90% of his company's income derived from U.S. clients.

123. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. She has a pending I-485 application with receipt number IOE0934101220. Her current J-1 status is nearing expiration. Not adjudicating her application threatens her ability to begin her U.S. medical

residency on time and jeopardizes her future, financial stability, and ability to work in a critical field where healthcare workers are urgently needed.

124. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with receipt number IOE0933719341. Failure to adjudicate her application has caused severe emotional distress, professional uncertainty, and financial hardship, as she approaches the expiration of her employment authorization. Plaintiff [REDACTED] has made significant contributions to critical U.S. technology sectors, including engineering work on advanced projects at NVIDIA, with patented innovations and nationally recognized research.

125. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 with receipt number IOE0929488543. Plaintiff [REDACTED] faces substantial emotional distress and professional hardship if her application isn't adjudicated, disrupting her ability to plan for grant applications, leadership roles, and long-term collaborations. Plaintiff [REDACTED] is a medical researcher engaged in long-term clinical research projects and clinical trials.

126. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-765 application with USCIS receipt number IOE9479249606. His

current work authorization is valid only until February 11, 2026. Plaintiff [REDACTED] faces the certainty of losing his ability to work if his application isn't adjudicated, which jeopardizes his livelihood, professional career, and long-term stability.

127. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 application with receipt number IOE0926065060. She faces emotional hardship and undue stress if her application isn't adjudicated.

128. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. She has a pending I-485 application with receipt number IOE0934060572. She faces immediate and severe hardship if her application isn't adjudicated. Her current work authorization expires on May 29, 2026. Upon expiration, she will be forced to cease working as a senior data scientist at the [REDACTED]. This loss threatens her financial stability. Furthermore, the policy threatens to separate her from her immediate family, including her husband and sibling. Plaintiff [REDACTED] work is vital to pediatric health research, involving the development of artificial intelligence algorithms that assist in diagnosing and treating serious diseases affecting children.

129. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-485 application with receipt number IOE0932502796 and a I-765 application with

receipt number IOE0934651817. Failure to adjudicate her applications has caused her significant legal, professional, financial, and emotional hardship. Without timely approval of her I-765, she faces the risk of losing employment authorization, income, health insurance, and the ability to continue her research position as a postdoctoral associate at the [REDACTED]

130. Plaintiff [REDACTED] is a citizen of Venezuela. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED] and has a pending I-130 application with receipt number IOE0932238099. He is married to a U.S. citizen and is currently detained in an ICE detention center. Failure to adjudicate his application has caused severe mental and emotional hardship. The delay prevents him from being released to reunite with and financially support his wife, who relies on his financial assistance. This delay also imposes significant financial hardship on his wife's family, who are supporting her in his absence.

131. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED] and has a pending I-485 application with receipt number IOE0932928975. Along with his I-485, Plaintiff [REDACTED] filed an I-765 application. Failure to adjudicate his application has caused him significant financial and emotional hardship, including the risk of losing his job and prolonged separation from his siblings and nephews, whom he has not visited in nearly nine years.

132. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-539 application with receipt number MCT2613410157. Failure to adjudicate his application threatens to cause him to miss the current academic term, preventing enrollment in his desired PhD program. This delay has caused substantial hardship by jeopardizing his career trajectory and research goals.

133. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-140 application with receipt number IOE0927320460. Failure to adjudicate his I-140 petition has caused significant hardship, making it extremely difficult for him to find or maintain employment. Plaintiff [REDACTED] is a postdoctoral research associate.

134. Plaintiff [REDACTED] is a citizen of Iran. She holds Alien Registration Number [REDACTED]. Ms. [REDACTED] has pending I-485 application with receipt number IOE0934074554 and I-765 application with receipt number IOE0934074555. Plaintiff [REDACTED] has made significant contributions to U.S. research and innovation, including collaborations on more than 25 scientific projects with the USDA and pharmaceutical companies and numerous peer-reviewed publications. Plaintiff [REDACTED] has suffered profound emotional distress after losing her father in February and being unable to attend his funeral. Failure to adjudicate her application has prevented her from accepting a new academic job offer, resulting in significant financial strain and psychological stress.

135. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-485 application with receipt number IOE0934701780 and I-765 application with receipt number IOE0934701781. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: IOE0934701782 and IOE0934701783. Plaintiff faces the potential loss of her job and is unable to pursue advanced career opportunities if her applications are not adjudicated and her spouse is unable to work or pursue full-time study, resulting in severe financial instability. The delay prolongs painful separation from their elderly parents.

136. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with receipt number MSC2590021893. The delay in adjudication has caused him financial hardship.

137. Plaintiff [REDACTED] is a citizen of Iran. He has a pending I-765 application with receipt number IOE9135856118. He risks losing his job if his application is not adjudicated. This threatens critical projects he is assigned to and jeopardizes his career development. Emotionally, prolonged separation from his family and the inability to travel have caused extreme daily stress and mental health challenges.

138. Plaintiff [REDACTED] is a citizen of Iran. She holds Alien Registration Number [REDACTED]. She has a pending I-485 application with

USCIS receipt number IOE0932473840. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932473843. Not adjudicating their applications have caused severe emotional, financial, and professional hardship for her and her family. Plaintiff [REDACTED] experienced significant distress, including a pregnancy loss, due to the uncertainty surrounding her immigration status. Additionally, the delay has jeopardized the professional future of the dependent applicant, a final-year PhD student, placing him at risk of losing work authorization and financial support.

139. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with USCIS number IOE0934174323. He also has a pending I-765. Plaintiff [REDACTED] faces the imminent loss of his primary source of income and significant financial hardship if his applications are not adjudicated. Additionally, the delay has caused him substantial emotional distress, as his fiancé is a U.S. citizen and the ongoing pause threatens to force an involuntary separation.

140. Plaintiff [REDACTED] is a citizen of Burma. Ms. [REDACTED] has a pending I-485 application with receipt number IOE0934187326. She is employed by [REDACTED] as a Software Engineer specializing in accessibility technology that enables individuals with disabilities to effectively use [REDACTED] products. If her application is not adjudicated, she risks losing her position at [REDACTED], which

would cause immediate financial hardship and irreparable damage to her highly specialized career. Additionally, the adjudication delay has caused severe emotional hardship due to prolonged family separation; Plaintiff [REDACTED] has not seen her family since 2019.

141. Plaintiff [REDACTED] is a citizen of Iran and Canada. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number IOE930363101. Plaintiff [REDACTED] also has a pending I-765 and I-131. If his applications are not adjudicated, he will face significant emotional and productivity hardship, as well as financial uncertainty for him and his family. Plaintiff [REDACTED] is currently employed as an Economist at [REDACTED], but his visa will expire in June 2026, placing him in a precarious position due to the ongoing delays.

142. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. She has a pending I-485 application with receipt number MSC2590182974. Plaintiff [REDACTED] has a derivative family member with the following receipt number: MSC2590182975. She holds a Ph.D. and is an expert in her field. If their applications are not adjudicated Plaintiffs face severe emotional distress, financial hardships, including risks to employment and mortgage obligations, and prolonged family separation, as plaintiffs have been unable to reunite with family abroad for nearly a decade.

143. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with receipt number IOE0934563834. He also has a pending I-765 with receipt number IOE0934964331. Plaintiff [REDACTED] is currently employed in a critical infrastructure role as a structural engineer with [REDACTED] and holds a PhD in civil engineering. If his applications are not adjudicated, he will face significant emotional, professional, and personal hardship. Plaintiff [REDACTED] faces personal hardship as he has been unable to freely travel to see his aging family and, as a gay man, returning to Iran is not a safe or realistic option.

144. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0934316649. Plaintiff [REDACTED] holds a master's degree. The delay in adjudication of his application has caused significant hardship, including lost job opportunities. Additionally, he has been unable to travel abroad to visit family, which has been especially difficult given his mother's multiple serious surgeries, including heart surgery.

145. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0932278056. Plaintiff [REDACTED] is a PhD

student in his final year. If his application is not adjudicated, he will face significant financial instability. Plaintiff [REDACTED] faces a high risk of losing his assistantship funding for the upcoming year. This uncertainty prevents him from finalizing career planning and threatens his ability to complete his degree.

146. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Ms. [REDACTED] has a pending I-485 application with receipt number IOE0935002816. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0935002818. If their applications are not adjudicated, Plaintiffs will face financial hardship and loss of job opportunities.

147. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application, USCIS receipt number MSC2590534462. He faces significant uncertainty and hardship if his application is not adjudicated.

148. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] [REDACTED] has been assigned Alien Registration Number [REDACTED]. He has a pending I-140 application with receipt number IOE0928772055. If his application is not adjudicated, Plaintiff [REDACTED] will face significant emotional and practical hardship. Plaintiff [REDACTED] suffers from an

underlying medical condition and the indefinite delay has exacerbated his health issues.

149. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 application with receipt number IOE0934067542. He holds a PhD in electronics from the University of California San Diego and works in the highly specialized field of data center electronic chip design. If his application is not adjudicated, Plaintiff [REDACTED] will face emotional hardship and uncertainty regarding his future, adversely affecting his career prospects.

150. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0934220646. If her application is not adjudicated, Plaintiff [REDACTED] will face significant financial hardship, jeopardizing her job stability and ability to contribute to household income. Furthermore, the continued hold on her application threatens her ability to maintain health insurance coverage and access essential medications.

151. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number

MSC2590200416. She works as a research scientist at the [REDACTED]. If her application is not adjudicated, Plaintiff [REDACTED] will face ongoing emotional distress, financial hardship, and professional limitations, including inability to travel for work or apply confidently for positions requiring permanent residency. Plaintiff [REDACTED] from the Azeri ethnic group in Iran, which is exempt from the travel ban.

152. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0934044477. She also has two pending Form I-765 applications for employment authorization, one based on her STEM OPT and another based on her adjustment of status. If her application is not adjudicated, Plaintiff [REDACTED] will face significant emotional and practical hardship and will be prevented from planning professionally or completing basic necessities such as renewing her driver's license. Additionally, Plaintiff [REDACTED] has been unable to leave the United States for approximately six years due to immigration restrictions, prolonging family separation and causing ongoing emotional distress.

153. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-485 with receipt number IOE0934220110. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934220108. If their applications are not adjudicated, Plaintiffs will face significant emotional and

financial hardships as they will be unable to secure and maintain employment. They have a U.S. citizen child and require the ability to work to provide financial stability. Additionally, Plaintiffs have been separated from their parents for over four and a half years, and the delay in obtaining permanent residency has indefinitely prolonged this family separation.

154. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. She has a pending I-485 application with receipt number IOE0934025669. She holds two doctoral degrees. If her application is not adjudicated, she will face significant emotional, financial, and professional hardship. She suffered the loss of her father during the COVID-19 pandemic without being able to be with her family and has been unable to visit her elderly mother, who has experienced health problems. The unresolved adjudication has hindered her employment prospects and threaten her ability to maintain employment and meet basic living expenses.

155. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-140 application with receipt number IOE0928186539. If his application is not adjudicated, Plaintiff [REDACTED] will face significant emotional distress, professional hardship, and family separation. The delay also jeopardizes his ability to apply for Optional Practical Training for a planned post-doctoral position beginning in May 2026, threatening his professional trajectory and lawful status.

156. Plaintiff [REDACTED] is a citizen of Iran and a lawful permanent resident of the United States. Mr. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending N-400 Application with receipt number IOE0934582737. If his application is not adjudicated, he will face significant emotional hardship, causing him to question whether to continue his research career in the United States. Moreover, the delay has hindered his ability to unite with his fiancé, as well as with his parent.

157. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has pending I-485 and I-765 applications, with receipt numbers IOE0932517269 and IOE0932517270. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: IOE0932517271 and IOE0932517272. He is employed as a tenure-track Assistant Professor at [REDACTED]. If their applications are not adjudicated, Plaintiffs will face severe professional, financial, and emotional hardship. Plaintiff [REDACTED] manages federally funded research projects totaling approximately \$95,000, has pending proposals amounting to approximately \$700,000, and supervises five students. [REDACTED] [REDACTED] has invested approximately \$500,000 in startup funds for his position. The delay threatens his employment, disrupts his students' education, and risks wasting significant university resources. Additionally, his wife is in

the final semester of her Ph.D. program and requires timely work authorization to begin employment upon graduation.

158. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application, with receipt number IOE0934045041. He is pursuing a Ph.D. If his application is not adjudicated, Plaintiff [REDACTED] will face significant hardship, adversely affecting both his professional and personal well-being.

159. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has been assigned Alien Registration Number [REDACTED]. Ms. [REDACTED] has a pending Form I-485 application with receipt number IOE0932855710. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932855707. Plaintiff [REDACTED] is a foreign-trained physician who has completed all required USMLE examinations and is ECFMG-certified, having invested over \$10,000 in fees. She is transitioning into direct patient-care training through a U.S. medical residency program. Her spouse is employed as a Research Associate II at the University of Texas Medical Branch, where he conducts specialized biomedical research on neurocognitive deficits following traumatic brain injury. If their applications are not adjudicated, Plaintiffs will face substantial financial hardship by threatening their employment stability and require Plaintiff [REDACTED] to delay her entry into residency training by at least one year, thereby disrupting her professional progression and ability to contribute to patient care.

160. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with the receipt number IOE0934886071. As a physician and neuroscientist specializing in aging and Alzheimer's disease research, Plaintiff [REDACTED] work depends on long-term stability and eligibility for grants and funding, which he cannot pursue due to the ongoing pause and unpredictability in adjudication. This policy has deprived him of stability, family unity, and the ability to fully contribute to his profession, despite his lawful presence and demonstrated commitment to work benefiting society.

161. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number of [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with the receipt number IOE0932400261. Plaintiff [REDACTED] has derivative family members with the following receipt number: IOE0932400263. The delay in processing his application is causing him significant emotional and practical hardship, including prolonged separation from his immediate family for nearly four years, inability to travel even for family emergencies, and uncertainty that impedes his ability to make critical life decisions regarding his career and stability in the United States. This hardship is exacerbated by the impending expiration of his I-20 on May 15, 2026, which heightens his anxiety and instability. As a Graduate Assistant and Ph.D. candidate specializing in

advanced materials and energy systems, Plaintiff [REDACTED] professional development and contributions to U.S. research and innovation are being undermined by this indefinite delay.

162. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number of [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0921154660. She earned a master's degree from Michigan State University, worked under OPT and OPT STEM authorizations, and is currently employed as a civil engineer. However, before final adjudication, the new policy halted processing of her application. Additionally, her husband, a green card holder through the National Interest Waiver with a Ph.D. from Arizona State University and employed at Google, faces naturalization delays due to the same policy. With a household income exceeding \$500,000 per year, Plaintiff [REDACTED] and her husband are not public charges but rather dedicated, contributing members of society whose lives and futures are imperiled by the unlawful pause in adjudication.

163. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has pending I-485 with the receipt number IOE0934047375; I-765 application with the receipt number IOE0934047376. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934047373 Plaintiff [REDACTED] is a PhD

candidate in Chemical Engineering at the [REDACTED] and has received a job offer for a Senior Scientist position starting in January 2025. Due to funding limitations, she will lose academic status after June 1, 2026, making prompt approval of her EAD essential. The ban on adjudicating her application has caused substantial hardship by delaying her ability to work and support herself during this transitional period.

164. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number. [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with the receipt number IOE0934164142; I-765 application with a receipt number IOE0934164143. As a final-year Ph.D. candidate with valid F-1 status through August 15, 2026, Plaintiff [REDACTED] was preparing to complete her degree and actively applying for academic positions, having advanced through several interview rounds and received positive signals for postdoctoral and tenure-track assistant professor positions. However, this delay has caused significant professional and financial hardship at a critical juncture in her career, as missed academic hiring opportunities may not recur until the next annual cycle.

165. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] [REDACTED] has an assigned Alien Registration Number [REDACTED] Plaintiff [REDACTED] has a pending I-485 application with the receipt number [REDACTED]

IOE0934074665. Plaintiff [REDACTED] has derivative family member with the following receipt number: IOE0934074664. The delay in adjudication caused by the ban is causing him emotional and financial hardship, as well as family separation. Most critically, he faces the loss of his job if his I-485 application is not approved by the end of 2026.

166. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number LIN2412952072; I-131 application with the receipt number LIN2414051776; I-765 application with a receipt number LIN2414051766. Plaintiff [REDACTED] has a derivative family member with the following receipt number LIN2412952087. Plaintiff [REDACTED] current H-1B status is set to expire in approximately ten months, and the uncertainty surrounding the adjudication of his adjustment of status places his ability to continue working lawfully in the United States at risk. If his H-1B expires before a decision is made, he will face serious financial hardship and jeopardize his stability and livelihood.

167. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number of [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with the receipt number of IOE0932617879. Plaintiff [REDACTED] has a derivative family member with the following receipt number:

IOE0932617881. The adjudication delay has caused significant professional and financial hardship, as Plaintiff has been unable to secure stable, long-term employment in his field despite his approved EB-2 NIW petition, with employers requiring lawful permanent resident status rather than temporary work authorization. Plaintiff and his spouse also hold permanent residence in Canada, with obligations due by June 2027, placing Plaintiff in an untenable position where remaining in the United States risks losing Canadian status, while leaving the United States would jeopardize his pending adjustment application.

168. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0932278559. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932278561. Since October 7, 2025, he has been unable to receive funding or income related to his professional work and has continued his research on a volunteer basis without compensation. The ongoing pause in adjudication has also created severe uncertainty regarding his and his spouse's long-term legal and personal stability, as they hold permanent residence in Canada subject to a strict residency obligation deadline in June 2026.

169. Plaintiff [REDACTED] is a citizen of Tanzania. Plaintiff [REDACTED] has a assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-929 with the receipt number LIN2519651409. The delay in adjudication of the I-929 petition due to the ban has caused significant emotional hardship to Plaintiff, with family separation being his greatest fear, as they he has two young children, ages four years and nine months.

170. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 Application with the receipt number IOE0932662122. The prolonged delay in adjudicating his Form I-485 has caused him substantial financial, professional, emotional, and family hardship.

171. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934571323. Plaintiff [REDACTED] has not yet been called for an interview, and the indefinite delay in processing his application is causing him significant emotional and financial hardship, including stress about his ability to continue working legally and support himself and his family.

172. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a

pending I-485 application with receipt number IOE0933953699; I-290B application with the receipt number IOE0927457057. Due to the delay in adjudication of her case, Plaintiff [REDACTED] has been unable to enroll as her husband's caregiver under the Department of Veterans Affairs' Veteran-Directed Care (VDC) program, despite his eligibility as a 100% disabled U.S. veteran. This has prevented her from providing authorized in-home care and support, directly impacting her husband's health and daily functioning.

173. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number SRC2590005800. Plaintiff [REDACTED] case is based on an EB-2 National Interest Waiver, a designation recognizing his work as critical to the United States' strategic interests. He holds a PhD in Mechanical Engineering and is employed at a top 10 U.S. technology company, where he contributes to high-impact innovation. The uncertainty has caused him substantial financial, professional, emotional, and family hardship.

174. Plaintiff [REDACTED] is a citizen of Nigeria. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application with the receipt number IOE9833467583. The delay in adjudication is creating financial hardship and threatens to result in family separation if his residency expires. Plaintiff [REDACTED] has three minor

children, and his spouse would be left to care for them alone, both physically and emotionally, if he is separated from his family.

175. Plaintiff [REDACTED] is a citizen of Laos. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application with the receipt number IOE9730356627. Due to the delay in adjudication, he has not been able to visit his parents in Laos for nearly ten years, fearing that leaving the United States without his case being completed could expose him to detention or deportation without due process. He also worries that if his green card extension expires before naturalization is complete, he could lose his employment, which would cause financial hardship for himself, his husband, and his parents who rely on his support.

176. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-751 application with the receipt number IOE0934332720. The delay prevents her from removing the conditions on her residence and threatens her ability to file for naturalization when she becomes eligible in September 2026. Plaintiff [REDACTED]'s conditional status also complicates her global employment, which requires international travel and visa applications.

177. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485

application with the receipt number IOE0917586236. Plaintiff's continued presence in the United States serves the national interest, as she is a PhD candidate in Computer Science conducting research on autonomous driving systems aimed at reducing the approximately 40,000 annual fatalities from car accidents in the U.S. Her work advances transportation safety and supports U.S. leadership in autonomous vehicle technology. The ban's impact on her case has caused substantial emotional and personal hardship, delaying her ability to secure permanent residency and maintain family unity.

178. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 with the receipt number IOE0934682589. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934682587. Upon graduating in Summer 2026, Plaintiff [REDACTED] will lose his F-1 status and university funding, creating financial instability and jeopardizing critical job opportunities essential to his career development.

179. Plaintiff [REDACTED] is a citizen of Nigeria. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application with the receipt number IOE0934978246. The delay in adjudication is causing her severe emotional distress and financial instability, as she is at a stage in life where she is ready to retire but cannot make definitive

financial commitments or close out her affairs while the matter remains unresolved. Most significantly, the delay is enforcing a prolonged separation from her children, causing her significant daily anxiety and preventing the family support system she needs for her retirement years.

180. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934269519. Plaintiff [REDACTED] has a derivative family member with the following receipt number IOE0934269517. Plaintiff [REDACTED] is an EB-2 National Interest Waiver Plaintiff; both her and her spouse, who is also a medical doctor, rely on the timely adjudication of her application for their professional and personal plans in the United States. This delay has caused significant emotional and professional hardship, creating uncertainty and limiting their ability to plan for the future.

181. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934237751; I-765 with the receipt number IOE0934237752. The pause in adjudication of his application is significantly delaying his green card process at a critical time as he plans to graduate from his Ph.D. Because the I-765 application is also paused, he faces the serious risk of losing work authorization upon graduation in 2026, forcing

him to rely solely on personal savings and causing severe financial strain and ongoing emotional distress.

182. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934407429; I-765 with the receipt number IOE0934407430. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934509981. Plaintiff [REDACTED] is employed in the semiconductor industry, contributing to critical research and development projects. Without timely adjudication, Plaintiff risks losing his employment authorization by June 2026, which would result in severe financial consequences and disrupt his professional contributions. The delay also jeopardizes the legal status and educational continuity of his wife, whose dependent application is directly tied to his case.

183. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number is [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934652892; I-765 application with the receipt number IOE0934652893. Plaintiff [REDACTED] has a derivative family member with the following receipt number IOE0934652890. Plaintiff [REDACTED] is presently on an H-1B visa expiring August 15, 2026. Plaintiff holds a tenure-track position, and his wife, a foreign medical graduate,

has been working as a postdoctoral researcher on a J-1 status (not subject to 212(e)) since December 2022. The inclusion of their country of citizenship as a “significant negative factor” in adjudications, combined with the indefinite processing pause, has caused substantial anxiety and jeopardized their future prospects despite their full compliance with immigration laws and extensive prior vetting.

184. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-765 with the receipt number IOE9444554764. She is presently in the 180-day period following the expiration of her Optional Practical Training (OPT), which will end on January 27, 2026. Plaintiff [REDACTED] is a postdoctoral fellow in the mathematics department at [REDACTED], where she is assigned to teach two courses and conduct research during the Spring 2026 semester. Without timely approval of her employment authorization, she will be unable to continue working, which will likely result in termination of her position and cause significant financial and emotional hardship.

185. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with receipt number IOE0932477031. Plaintiff [REDACTED]

is maintaining lawful status in the United States through F-1 STEM OPT, which is time-limited and not a permanent solution. Because his I-485 cannot be adjudicated, he faces the risk of exhausting his available nonimmigrant status despite having an approved immigrant petition and otherwise being eligible for adjustment of status. This delay has caused significant uncertainty affecting his ability to make long-term professional and personal decisions, including employment planning, housing, and future career commitments.

186. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number MSC2490947166. The delay in adjudication has caused Plaintiff [REDACTED] significant emotional hardship, as she has not seen her family for more than eight years, resulting in prolonged family separation and considerable stress and anxiety. Furthermore, Plaintiff [REDACTED] has missed numerous professional opportunities, including company meetings and events in Europe, because she is unable to travel.

187. Plaintiff [REDACTED] Soto is a citizen of Venezuela. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934522331. Plaintiff [REDACTED] is experiencing financial distress as she is currently without a work permit, not allowing her to help support her family. An

agency that she previously worked for has offered to rehire her once she has work authorization, but she cannot commit to concrete employment plans since she does not know when her applications will be processed.

188. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934043567 and a pending I-765 application under receipt number IOE0934043568. Plaintiff [REDACTED] current work authorization is set to expire on June 2026 and without approval of his Employment Authorization Document (EAD), he faces the loss of his job and significant financial hardship. The ban on adjudicating his applications has caused substantial adverse effects on his employment and financial stability.

189. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number MSC2590077174. Plaintiff [REDACTED] has a derivative family member with the following receipt numbers: MSC2590077171. The delay on the processing of his application has caused him significant emotional distress due to uncertainty about his future, limited his job mobility by restricting his ability to change positions or pursue new opportunities, and prevented him from traveling to visit family, resulting in prolonged separation and personal hardship.

190. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number MSC2590155799. Plaintiff [REDACTED] holds a PhD and works as an expert Data Scientist at [REDACTED], leading multiple million-dollar projects, and has contributed to the academic community through research and teaching at the University of Michigan. Despite his significant contributions and compliance with all U.S. immigration laws, he remains in legal limbo solely due to his nationality, facing substantial professional, financial, and emotional hardships caused by the ban.

191. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934171892. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0934171889. Plaintiff [REDACTED] employer has filed an extension of his H1B visa, which remains pending following a Request for Initial Evidence from USCIS, raising concerns about his continued employment. Due to the delay in application progressing, Plaintiff [REDACTED] and his family have suffered from financial and professional distress.

192. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number is [REDACTED]. Plaintiff [REDACTED] has a

pending I-485 application under receipt number MSC2490922380. Plaintiff [REDACTED] is currently employed as a tenure-track Assistant Professor at [REDACTED] [REDACTED] but risks his teaching, mentoring of students, and conducting federally funded research due to the application processing delays. On a personal level, the prolonged delay has caused ongoing stress and anxiety, preventing him from making long-term plans such as securing stable housing, traveling to visit family abroad, or committing to professional opportunities requiring permanent status.

193. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration number [REDACTED]. Plaintiff currently has a pending I-485 application under receipt number IOE0932245409. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0932245411. Plaintiff [REDACTED] is a PhD student and cannot progress in his future academic plans due to processing delays. The fear of the applications' outcomes he and his spouse are unsure of their future life and careers in the country.

194. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] currently had a pending I-765 under receipt number IOE9460533407 and . Plaintiff [REDACTED] earned a master's degree in computer science and worked full-time at Tesla until her work authorization expired on December 2025. The delay in the processing

of her applications has caused her both emotional and financial hardship, as her job was her sole source of income and she now faces uncertainty in meeting her financial obligations, including rent. The risk of losing her employment threatens not only her livelihood but also her immigration status, as she has no alternative job offers and has already graduated.

195. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0933127656. Plaintiff [REDACTED] has a derivative family member with the following receipt number: IOE0933127655. Despite having an active job offer and internship opportunities with high-tech companies that require lawful permanent resident status or U.S. citizenship, Plaintiff [REDACTED] has been unable to accept or begin these positions due to the prolonged delay in adjudication of his application. This delay has caused him significant financial hardship through lost earnings and missed career advancement, as well as emotional distress from ongoing uncertainty and anxiety.

196. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-140 petition under receipt number IOE0930630494. As an assistant professor in the Mathematics Department at Missouri State

University, Plaintiff [REDACTED] has not been allowed to travel outside the U.S., making him unable to attend or present at international conferences. This ongoing uncertainty has caused him considerable emotional distress, interfering with his professional focus and personal well-being.

197. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934742217. Plaintiff [REDACTED] is currently a PhD student and wishes to pursue a postdoctoral position within the country; however, the delays cause delay the ban has disrupted her plan to pursue further academic progress. This inability to contribute to the country's development has caused both professional and emotional distress to plaintiff.

198. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned alien registration number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0934046261. Plaintiff is a postdoctoral research scholar at [REDACTED] and a contractor for [REDACTED], where his work on advanced manufacturing and smart systems research projects is critical and time-sensitive. However, due to processing delays, his professional progress has been stalled causing him professional distress; additionally, in a personal matter, he has experienced emotional distress as he is unable to plan a future with his fiancé as he is unsure of the future of his immigration status.

199. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application under receipt number IOE9114255471. Plaintiff is due to graduate from his Chemical Engineering PhD in program in January 2026 and has a job offer from [REDACTED] as a Quality Engineer, with a start date of February 2, 2026; however, with the delay in his application processing, he is unable to work and sustain himself financially. Currently, he is depleting his savings and is suffering from severe financial hardship and irreparable professional harm due to delays.

200. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0932264459. Plaintiff [REDACTED] has been working as a Quantitative Researcher at [REDACTED] with an annual compensation of approximately \$700,000 to \$800,000; however, his professional trajectory has been limited by his lack of a Green Card causing financial and professional distress. Additionally, plaintiff has been separated from some of his family members since 2019, increasing his emotional distress due to prolonged separation.

201. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0934034950. Plaintiff [REDACTED] has a

derivative family member with the following receipt number: IOE0934034952. Plaintiff [REDACTED] has an approved National Interest Waiver reflecting how his pharmaceutical research has substantial merit and is in the national interest of the U.S. Plaintiff [REDACTED] delay in application processing extends his prolonged separation from his families and causes significant emotional and psychological hardship, negatively impacting his ability to focus on his research responsibilities. The continued delay in his applications causes both professional and emotional distress for him and his contributions to scientific and healthcare advancements in the country.

202. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number is [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application under receipt number IOE0932752748. The delay in processing his application has caused professional hardship, as he is unable to obtain employment in his field of quantum computation due to his lack of a Green Card. Several companies have granted him conditional offers contingent on his approval of a Green Card; however, processing delays are causing further professional, financial, and emotional distress for him.

203. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number

IOE0932279205. Plaintiff [REDACTED] current work authorization is set to expire in January 2026 and he fears his inability to meet financial and professional responsibilities without the approval of his work authorization. Most of all, a prolonged disruption of his ability to work places him at risk of losing his employment, disrupting his career, and professional stability, causing further emotional and professional distress.

204. 199, Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned alien registration number [REDACTED]. Plaintiff [REDACTED] currently has a pending I-485 application under receipt number IOE0934861832. Due to the delays in application processing, plaintiff risks losing his ability to work and fears suffering financial hardship. Additionally, due to the delays, he has experienced substantial anxiety and distress, negatively impacting his ability to focus and perform effectively at work.

205. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has an assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application with the receipt number IOE0933034999; I-131 application with the receipt number IOE0933035001, I-765 application with receipt number IOE0933035000; Plaintiff [REDACTED] I-140 priority date is May 15, 2023, and he is presently in L-1B status, having transferred from Canada to the

United States in June 2025. This delay has adversely affected his ability to maintain family connections and pursue employment opportunities.

206. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Ms. [REDACTED] has a pending I-485 application with USCIS receipt number MSC2590020285. Plaintiff [REDACTED] was scheduled for an adjustment-of-status interview on December 5, 2025, which was canceled due to her Iranian nationality. Plaintiff [REDACTED] is a physician with an approved EB-2 National Interest Waiver. Plaintiff [REDACTED]'s continued training, patient care, and career opportunities, including a highly competitive Interventional Pulmonology fellowship at [REDACTED], are threatened by the disruption in adjudicating her application.

207. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number IOE0934218135. Plaintiff [REDACTED] is a healthcare and AI researcher with an approved National Interest Waiver. Plaintiff [REDACTED] faces disruptions to his professional opportunities and personal life due to the disruption in adjudicating his application.

208. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Ms.

██████████ has a pending I-485 application with USCIS receipt number IOE0934104469. Plaintiff ██████████ is an academic with H1-B status. Plaintiff's career development opportunities and personal life are hindered by the disruption in adjudicating her application.

209. Plaintiff ██████████ is a citizen of Iran. Ms. ██████████ has an assigned Alien Registration Number ██████████. Ms. ██████████ has a pending I-485 application with USCIS receipt number IOE0932254451. Plaintiff ██████████ derivative spouse has Alien Registration Number ██████████ and USCIS receipt number IOE0932254453. Plaintiff ██████████ is pregnant; she and her husband family face ongoing hardship due to the disruption in adjudicating her application.

210. Plaintiff ██████████ is a citizen of The Gambia. Ms. ██████████ has an assigned Alien Registration Number ██████████. Ms. ██████████ has a pending I-90 application with USCIS receipt number IOE9486785894. Plaintiff ██████████ has suffered emotional and financial hardship due to the disruption in adjudicating her application.

211. Plaintiff ██████████ is a citizen of Iran. Mr. ██████████ has an assigned Alien Registration Number ██████████. Mr. ██████████ has a pending I-485 application with USCIS receipt number IOE0932323621. Plaintiff ██████████ derivative spouse has Alien Registration Number

██████████ and USCIS receipt number IOE0932323620. Plaintiff ██████████
██████████ and his wife's career opportunities are impeded by the disruption in
adjudicating his application.

212. Plaintiff ██████████ is a citizen of Iran. Mr. ██████████
██████████ has an assigned Alien Registration Number ██████████. Mr.
██████████ has a pending I-485 application with USCIS receipt
number IOE0932839145. Plaintiff ██████████ ██████████ faces ongoing
hardship due to the disruption in adjudicating his application.

213. Plaintiff ██████████ is a citizen of Iran. Mr. ██████████ has an assigned Alien
Registration Number ██████████. Mr. ██████████ has a pending I-485 application
with USCIS receipt number IOE0933146598. The delay in adjudication caused
by the ban has imposed significant emotional and financial hardship on Plaintiff
██████████ and his family.

214. Plaintiff ██████████ is a citizen of Iran. Mr. ██████████ has an assigned Alien
Registration Number ██████████. Mr. ██████████ has a pending I-485 application
with USCIS receipt number IOE0934426762. Plaintiff ██████████ derivative
spouse has Alien Registration Number ██████████ and USCIS receipt number
IOE0934426759. The delay in adjudication caused by the ban has imposed
significant emotional and financial hardship on Plaintiff ██████████ and his family.

215. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has a pending I-140 application with USCIS receipt number IOE0932688115. Plaintiff [REDACTED] has faced substantial professional and personal hardship due to the disruption in adjudicating his application.

216. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number IOE0934154785 and an I-131 application with USCIS receipt number IOE0934154787. Plaintiff [REDACTED] faces ongoing hardship due to the disruption in adjudicating his applications.

217. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending N-400 application with USCIS receipt number IOE9711798987. Plaintiff [REDACTED] career opportunities have been significantly negatively impacted by the disruption in adjudicating his application.

218. Plaintiff [REDACTED] is a citizen of Nigeria. Ms. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Ms. [REDACTED] has a pending I-485 application with USCIS receipt number IOE0934067547. The ongoing delay in adjudicating her application has limited her career advancement opportunities and prevented her from traveling to visit family, also leaving her without family support for her multiple medical issues.

219. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Ms. [REDACTED] has a pending I-485 application with USCIS receipt number IOE0933047620. Plaintiff [REDACTED] and her family face significant hardship due to the disruption in adjudicating her application.

220. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number IOE0934024480. Plaintiff [REDACTED] derivative spouse has a pending I-485 application with USCIS receipt number IOE0934024482. The delay in adjudication caused by the ban has resulted in serious emotional hardship, financial loss, and missed future job opportunities for Plaintiff [REDACTED] and his spouse.

221. Plaintiff [REDACTED] [REDACTED] is a citizen of Laos. Ms. [REDACTED] has a pending I-130 petition; USCIS receipt number IOE9802794919. Plaintiff [REDACTED] is married to a U.S. citizen, and they have a son. The delay in processing has caused the family to face separation, as her husband's employer expects him to relocate to the United States, and prevents the family from making housing decisions and other long-term plans.

222. Plaintiff [REDACTED] is a citizen of Iran by birth. He has been assigned Alien Registration Number [REDACTED]. Dr. [REDACTED] has a pending I-140

petition; USCIS receipt number IOE0934838474. Plaintiff T[REDACTED] is a medical doctor actively involved in cancer-related research and has made substantial efforts to build a career in the United States focused on advancing cancer research and improving patient outcomes. This uncertainty impacts his long-term career planning, research continuity, and professional stability, all critical in high-stakes medical and oncology-related work.

223. Plaintiff [REDACTED] is a citizen of Iran. She has been assigned Alien Registration number [REDACTED]. The Plaintiff has a pending I-485 application; USCIS receipt number IOE0934389411. The Plaintiff has derivative family members with the following receipt numbers: IOE0934389408, IOE0934389416, and IOE0934389414. The family has been unable to travel to visit a dying family member and may also soon face serious financial hardship because of the delay in adjudicating the petitions.

224. Plaintiff [REDACTED] is a citizen of Iran. She has a pending I-485; USCIS receipt number IOE0932369458. Plaintiff [REDACTED] derivative family member's receipt number is IOE0932369460. Plaintiff [REDACTED] [REDACTED] has earned her degree and is on STEM OPT with only one year of status remaining. She has been building her career in the United States, and the delay adjudicating her application has caused her and her family substantial uncertainty and distress.

225. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned the Alien Registration number [REDACTED] and is the principal applicant on a pending I-485 application; USCIS receipt number MSC2590024643. His wife is his derivative with receipt number IOE0934099074. Plaintiff [REDACTED] is a university researcher. His wife is completing her PhD studies. The delay in adjudication of their I-485 applications has jeopardized their employment opportunities, as well as their academic and professional futures.

226. Plaintiff [REDACTED] is a citizen of Iran. She has a pending I-765 application; USCIS receipt number IOE9396058152. She is the lead on a critical project at her company, but due to the ban on adjudicating her application, Plaintiff [REDACTED] faces a serious risk of job loss.

227. Plaintiff [REDACTED] is a citizen of Venezuela. He has been assigned the Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-130 application and a pending I-485 petition with USCIS receipt number IOE0932638878. Plaintiff [REDACTED] is married to a US citizen. The ban has halted their lives, forcing them to live in fear and uncertainty.

228. Plaintiff [REDACTED] is a citizen of the United States and the Petitioner for her husband, [REDACTED], a citizen of Syria. Plaintiff [REDACTED] has a pending I-130 petition, filed on behalf of her husband; USCIS receipt number AMM2024862002. The delay in adjudication of this petition has caused

significant family separation, as her husband is not in the United States. Plaintiff [REDACTED] has been forced to travel every two months to maintain her daughter's medical appointments and vaccinations, which has prevented her from maintaining steady employment. Plaintiff [REDACTED] has suffered additional financial hardship due to the lack of her husband's income, sanctions, and the absence of banking or money transfer services in Syria.

229. Plaintiff [REDACTED] is a citizen of Cuba. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0931386005. The delay in adjudication of his application has caused him significant hardship, including the inability to secure employment due to the lack of a valid work permit.

230. Plaintiff [REDACTED] is a citizen of Venezuela. He has a pending I-485 application; USCIS receipt number IOE0933247653. The delay has caused family separation, stress, and hardship. The Plaintiff and his family feel like their lives are on hold.

231. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 STEM OPT application; USCIS receipt number IOE9214013347. She has lived in the United States for the past six years, during which time she earned a master's degree and a PhD, and is currently employed as a postdoctoral researcher. She has invested substantial time and financial resources into her

education and immigration process, and the ongoing delay threatens her career, financial stability, and future.

232. Plaintiff [REDACTED] is a citizen of Iran. She has been assigned the Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0932610188. Plaintiff is a final-year PhD candidate in electrical engineering, and her husband is a United States citizen and abdominal radiologist. The family is distressed over the potential for family separation caused by the ban.

233. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-140 petition; USCIS receipt number IOE0927674506. Plaintiff [REDACTED] has been unable to file an I-485 adjustment of status application due to the unresolved I-140. Plaintiff [REDACTED] has made substantial contributions to the field of Artificial Intelligence Safety and Security, securing internships at leading American companies such as Microsoft Research and Apple. Despite these accomplishments, Plaintiff [REDACTED] faces employment barriers as a result of the ban.

234. Plaintiff [REDACTED] a citizen of Iran. Plaintiff [REDACTED] has a pending I-140 petition; USCIS receipt number IOE0927205002. Despite his significant professional accomplishments, including publishing multiple papers in top-tier conferences and journals and collaborating with [REDACTED] for over a

year, Plaintiff [REDACTED] faces substantial emotional and career-related hardships due to the ban.

235. Plaintiff [REDACTED] is a citizen of Iran and a lawful permanent resident of the United States. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE9046315324. Due to the delay in adjudication caused by the ban, Plaintiff [REDACTED] faces the imminent loss of her ability to work after February 12, 2026, resulting in significant financial hardship and uncertainty regarding her ability to support herself.

236. Plaintiff [REDACTED] is a citizen of Venezuela who has resided in the United States for more than thirty years. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0927036962. She is the sole earner for her household and fears that loss of her legal status would jeopardize their financial stability and her ability to support her disabled husband and her son, who serves in the National Guard.

237. Plaintiff [REDACTED] is a citizen of Iran. He has a pending I-485 application; USCIS receipt number IOE0934439173. Plaintiff [REDACTED] has a derivative family member with receipt number IOE0934439170. Plaintiff [REDACTED] earned his Ph.D. and is currently employed full-time as a Machine Learning Scientist in the technology industry. The Plaintiff faces the potential loss of his

job if the ban continues; additionally, his wife, a PhD student, is at risk of having her studies disrupted.

238. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0934056345. She has a derivative family member with receipt number IOE0934056346. Plaintiff [REDACTED] is a Cancer Research PhD student research assistant whose work focuses on lung cancer research. Plaintiff's husband has been her primary source of support throughout her demanding academic training. The delay threatens the financial security and household stability of the family.

239. Plaintiff [REDACTED] is a citizen of Haiti. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0919025860. The ban has resulted in the expiration of work authorization for her husband, the primary beneficiary. Plaintiff [REDACTED] urgently needs resolution so that her husband can work and their family may be reunited.

240. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0934184546. She has a derivative family member with receipt number IOE0934184548. If the pause continues, she is facing disruption of her PhD program and consequent employment. Her husband also faces the risk of losing his work authorization, thus placing them under significant financial strain.

241. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-129 petition filed on his behalf by his employer; USCIS receipt number IOE0932430106. Plaintiff [REDACTED] recently began his appointment as a university assistant professor after being awarded an endowed chair in Marketing Analytics. Plaintiff [REDACTED] is facing disruption of his teaching and research work because of the ban.

242. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE9803371205. She is facing possible loss of job and professional opportunities and financial hardship due to the potential impact on her work authorization.

243. Plaintiff [REDACTED] is a citizen of Libya. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE0934147171. Plaintiff [REDACTED] is a physician but is unable to work without employment authorization and has had no income since completing his training. His wife is currently a student and does not work, leaving the household without any income. Due to the delay in adjudication caused by the ban, Plaintiff [REDACTED] has been forced to borrow money to cover basic living expenses, resulting in significant financial and emotional hardship. He lacks health insurance and is particularly concerned about the health coverage of his wife and their two-year-old daughter.

244. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE9301250729. Plaintiff [REDACTED] faces the potential inability to work should the pause persist, which would cause significant financial, professional, and personal hardship and could force her to abandon critical research projects.

245. Plaintiff [REDACTED] is a citizen of Iran and a lawful permanent resident of the United States. She has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending N-400 application; USCIS receipt number IOE9869394121. She was scheduled for her naturalization interview on December 9, 2025, but it was canceled following the December 2, 2025, USCIS policy memos. After nearly eleven years in the United States, she had looked forward to becoming a U.S. citizen. Plaintiff [REDACTED] has dedicated her career since 2017 to public service as a city planner, contributing to community development and environmental protection, yet she is labeled “high risk” solely because of her nationality. Additionally, she faces financial hardship, having recently purchased her first home and incurring unexpected legal expenses to challenge the discriminatory policy.

246. Plaintiff [REDACTED] is a citizen of Iran and a lawful permanent resident of the United States. He has a pending N-400 application; USCIS receipt number IOE9200532643. This delay has also adversely affected his

wife's green card extension request. Furthermore, the travel ban has separated Plaintiff [REDACTED] from his immediate family members, who are unable to visit him. Without naturalization, he is unable to petition for their green cards, indefinitely delaying family reunification and prolonging their uncertainty and distress.

247. Plaintiff [REDACTED] is a citizen of Iran. She does not have an Alien Registration Number. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE9154942889. She also has a pending I-140 application; receipt number IOE0924476666. Plaintiff [REDACTED] has a full-time job offer with a confirmed start date of January 12, 2026, which she will be unable to begin without timely approval of her work authorization. The ongoing delay threatens not only her employment but also her lawful presence in the United States, through no fault of her own.

248. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-539 application; USCIS receipt number MCT2678255048. He was admitted to a fully funded Ph.D. program that would provide a full funding package, including tuition waiver, stipend, and health insurance. Financially, Plaintiff [REDACTED] and his spouse rely solely on her graduate assistantship stipend to cover living expenses. Plaintiff [REDACTED] deliberately chose a fully funded position in the same city where his spouse pursues her doctoral studies to maintain family unity

and avoid disruption. Due to the uncertainty caused by the policy, he was forced to request a deferral of his admission and faces the risk that the university may not preserve his offer and funding.

249. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] [REDACTED] has a pending I-485 application; USCIS receipt number IOE0933029847. She has been separated from her family in Iran for over six years, unable to visit aging parents and her elderly grandmother, which has caused her profound emotional distress. Plaintiff [REDACTED] is facing the loss of her professional opportunities, as several prospective employers require permanent work authorization, and a current employer is awaiting her green card approval to offer her an advanced position.

250. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned Alien Registration Number [REDACTED] Plaintiff [REDACTED] is the principal beneficiary of a pending I-485 application; USCIS receipt number IOE0932829686 Plaintiff [REDACTED] entered the United States on a single-entry visa and has maintained continuous lawful status since that time. Because his visa did not permit reentry, he has been unable to return to Iran or see his family without jeopardizing his doctoral studies. During this prolonged separation, both of his parents passed away, and he was unable to travel to Iran due to immigration constraints. Despite these hardships, Plaintiff

██████████ has completed his PhD and contributed to U.S. academic research through peer-reviewed publications. He is currently employed as a Structural Engineer. This categorical suspension of his application without consideration of individual circumstances has caused profound and disproportionate harm to Plaintiff ██████████ personal, familial, and professional life.

251. Plaintiff ██████████ is a citizen of Iran. She has been assigned Alien Registration Number ██████████ Plaintiff ██████████ is the principal beneficiary of a pending I-765 application; USCIS receipt number IOE9143489727. The delay in adjudication of her employment authorization application is causing severe financial, professional, and personal hardship. She faces the loss of her hospital job as a Medical Imaging and Data Analyst. In this role, she contributes to critical Alzheimer's disease research for a federally funded study by developing machine learning algorithms for neuroimaging analysis and managing MRI and PET imaging data across multiple hospitals and clinical research sites nationwide. Losing this position would negatively impact her career, income, and employer-sponsored health insurance, and could delay the Alzheimer's research study due to the time required to train a replacement.

252. Plaintiff ██████████ is a citizen of Haiti. He has been assigned Alien Registration Number ██████████. Plaintiff ██████████ has a pending I-129

petition; USCIS receipt number IOE0933412664. Plaintiff [REDACTED] is currently on Temporary Protected Status (TPS), which is set to expire on February 3, 2026. Without approval of his petition, he will fall out of status, be unable to work, and will be unable to support his family, including his seven-month-old child. He faces the risk of losing housing and health insurance and may be forced to leave the United States.

253. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] is the principal beneficiary of a pending I-485 application; USCIS receipt number IOE0933040788. The delay in adjudication has prevented him from making long-term plans, traveling safely, or making personal life commitments, as his permanent residency status remains arbitrarily delayed without any timeline or explanation.

254. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application USCIS receipt number MSC2590093723. Plaintiff [REDACTED] I-140 petition was approved under the EB-2 National Interest Waiver category, recognizing that his work is of significant benefit to the United States. Despite completing all processing steps and having an approvable application, the indefinite delay in adjudication caused by the ban has left him in legal limbo,

preventing him from making long-term life plans such as purchasing a home or fully committing to career projects.

255. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0934963995. Due to the prolonged delay in adjudication caused by the ban, Plaintiff [REDACTED] is unable to lawfully work, which jeopardizes his ability to graduate on schedule and threatens pending and anticipated employment opportunities. This agency inaction has caused and continues to cause ongoing and irreparable academic, professional, and financial harm for which there is no adequate alternative remedy.

256. Plaintiff [REDACTED] is a citizen of Iran and a lawful permanent resident of the United States. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number MSC2590014521. Plaintiff [REDACTED] has been unable to leave the U.S. to visit his family for nine years. Plaintiff [REDACTED] values living in the United States, where he has studied, worked, and lived responsibly, but feels unfairly targeted as a security risk solely due to his Iranian birth. This ban has caused substantial and ongoing harm to Plaintiff [REDACTED] ability to obtain permanent residency and reunite with his family.

257. Plaintiff [REDACTED] is a citizen of Iran. She has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] has a pending I-485

application; USCIS receipt number IOE0932481799. This delay has caused immediate, concrete, and irreparable hardship, including the imminent loss of her work authorization, which will legally prohibit her from earning income or supporting herself, resulting in serious financial hardship and professional harm. The prolonged uncertainty and forced unemployment have disrupted her career and damaged her professional standing, harms that cannot be remedied by future approval alone.

258. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-485 application; USCIS receipt number IOE0934696609. The delay in adjudication has caused him financial hardship, family separation, and emotional hardship, significantly affecting his well-being and stability.

259. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] has a pending I-765 application; USCIS receipt number IOE9364736902. Plaintiff has completed all requirements for his Ph.D. and has secured a full-time job offer contingent on OPT approval, with a monthly salary of approximately \$20,000 before taxes. Failure to approve his OPT in time will result in the loss of this opportunity, causing significant financial harm. If his OPT is not approved by the end of the 60-day grace period on February 18, 2026, he will fall out of status through no fault of his own, placing him at risk of deportation and enforcement action by U.S. Immigration and Customs Enforcement (ICE). The delay in

adjudication has caused Plaintiff severe emotional, financial, and legal hardship, including constant fear and anxiety over potential removal. Moreover, the delay threatens to irreparably harm Plaintiff's career at its outset, disrupt his lawful immigration status, and destabilize his personal and professional life.

260. Plaintiff [REDACTED] is a citizen of Syria. He has been assigned Alien Registration Number [REDACTED]. He has a pending I-765 application. Plaintiff [REDACTED] is petitioning for himself and currently resides in Mountain View, California, with plans to possibly relocate to New York City in the near future. Due to the ban on adjudicating certain immigration petitions, Plaintiff [REDACTED] ability to proceed with his petition has been negatively impacted, causing uncertainty and hardship in his immigration status and personal life.

261. Plaintiff [REDACTED] is a citizen of Iran. He has been assigned Alien Registration Number [REDACTED]. Plaintiff [REDACTED] is the principal beneficiary of a pending I-140 petition; USCIS receipt number IOE0927674508. Plaintiff's petition remains unadjudicated due to a prolonged pause in processing, which has caused significant professional and personal hardship. This delay has frozen his long-term career planning, limited professional mobility, and constrained his ability to make stable financial and housing commitments. The uncertainty has imposed sustained stress, particularly as he

prepares for major life events, including the birth of his first child, without clarity regarding his ability to remain and contribute in the United States.

262. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 application with USCIS receipt number IOE0927568350. Plaintiff [REDACTED] faces ongoing personal and professional hardship due to the disruption in adjudicating her application.

263. Plaintiff [REDACTED] is a citizen of Iran. Ms. [REDACTED] has a pending I-140 application with USCIS receipt number IOE0925818273. Plaintiff [REDACTED] faces ongoing hardship due to the disruption in adjudicating her application.

264. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending I-485 application with USCIS receipt number IOE9198947939. The delay in adjudication caused by the ban has caused substantial emotional and financial hardship to Plaintiff Abootorabi and his family.

265. Plaintiff [REDACTED] is a citizen of Venezuela. Mr. [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] has a pending N-400 application with USCIS receipt number IOE0933415281. Plaintiff [REDACTED] was working as a double-board certified physician in Anesthesiology and Critical Care Medicine on an H1-B visa at [REDACTED]—fields currently experiencing critical shortages in the United States. Plaintiff [REDACTED] is

experiencing ongoing personal and professional hardship as a result of the disruption in adjudicating his application.

266. Plaintiff [REDACTED] is a citizen of Venezuela. Mr. [REDACTED] [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] [REDACTED] has a pending I-485 application with USCIS receipt number IOE0917335146. The delay in adjudication of his application due to the ban has caused him significant emotional and professional hardship.

267. Plaintiff [REDACTED] is a citizen of Cuba. Mr. [REDACTED] [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] [REDACTED] has a pending I-130 application with USCIS receipt number IOE9558424168. Plaintiff [REDACTED] is unable to travel internationally until his petition is adjudicated, separating him from his wife who lives abroad. The delay in adjudicating Plaintiff [REDACTED] petition is causing him ongoing hardship.

268. Plaintiff [REDACTED] is a citizen of Iran. Mr. [REDACTED] [REDACTED] has an assigned Alien Registration Number [REDACTED]. Mr. [REDACTED] [REDACTED] has a pending I-485 application with USCIS receipt number IOE0934305716. Plaintiff [REDACTED] and his family face ongoing hardship due to the disruption in adjudicating his application.

269. Plaintiff [REDACTED] is a citizen of Iran. Plaintiff [REDACTED] [REDACTED] has been assigned Alien Registration Number [REDACTED]. He has a pending N-400

application; USCIS receipt number IOE9276711700. The Plaintiff was interviewed by USCIS and scheduled for an oath ceremony on December 5, 2025, which was abruptly cancelled and placed on indefinite hold due to the ban. Despite his PhD from a U.S.-accredited university, he is barred from applying to many federal positions that require U.S. citizenship, preventing him from fully utilizing his advanced skills and advancing his career.

270. Defendant Department of Homeland Security is a cabinet-level department of the U.S. federal government. It houses the U.S. Citizenship and Immigration Services, Immigration and Customs Enforcement, and Customs and Border Protection as some of its many component agencies, and through these administers immigration policy.

271. Defendant U.S. Citizenship and Immigration Services (“USCIS”) is a component agency within the Department of Homeland Security (“DHS”), 6 U.S.C. § 271, and an agency within the meaning of the Administrative Procedure Act, 5 U.S.C. § 551(1). USCIS is responsible for administering immigration benefits within the United States, including applications for adjustment of status (green cards), asylum, employment authorization, change or extension of nonimmigrant status, and other benefits.

III. JURISDICTION AND VENUE

272. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question jurisdiction). *Califano v. Sanders*, 430 U.S. 99, 106 (1977).

273. This Court has the authority to grant relief pursuant to the APA, 5 U.S.C. § 701 *et seq.*, and pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201. The United States has waived sovereign immunity pursuant to 5 U.S.C. § 702.

274. Venue in this judicial district is proper under 28 U.S.C. § 1391(e)(1)(C), as Defendant is a U.S. agency, Plaintiffs [REDACTED], [REDACTED], [REDACTED], [REDACTED] reside in this district, and no real property is involved in this action.

275. Joinder is proper in this action as the questions of law are identical to all Plaintiffs in this action.

276. Plaintiffs have exhausted all administrative remedies required by law.

IV. APA REVIEW AND STANDING

277. Plaintiffs are aggrieved by the final agency action of Defendants by and through the November 27, 2025, December 2, 2025 and January 1, 2025 policy memoranda that are final agency action for which review is provided under 5 U.S.C. § 704.

278. Plaintiffs have Article III and prudential standing to litigate in this Court as (1) they have suffered an “injury in fact,” (2) that is “fairly traceable to” the

challenged conduct of Defendant, and (3) is “likely to be redressed” by a favorable decision. *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560-61 (1992). Defendants’ unlawful implementation of the Presidential Proclamations to hold the adjudication of all immigration benefit requests and implement *de facto* national origin discrimination in the adjudication of any benefit request has injured Plaintiffs in a multitude of ways, ranging from delayed or withheld adjudication of benefit requests for which Plaintiffs have already paid substantial amounts of money. An order setting aside Defendants’ policy alert and memoranda would redress Plaintiffs’ injuries.

V. BACKGROUND

279. On November 26, 2025, Rahmanullah Lakanwal, an Afghan national, allegedly drove to Washington, D.C. and opened fire on two National Guard members, killing one and critically injuring another.⁴

280. One day after this regrettable attack, on November 27, 2025, USCIS released a policy alert that adjudicators must immediately “consider relevant country-specific factors,” namely whether an individual is from one of the countries identified in Presidential Proclamations restricting entry to the United States

⁴ U.S. Dep’t of Justice, U.S. Attorney’s Office for the District of Columbia, *Afghan National Charged with the Murder of National Guard Soldier Sarah Beckstrom* (Dec. 2, 2025), <https://www.justice.gov/usao-dc/pr/afghan-national-charged-murder-national-guard-soldier-sarah-beckstrom>

under 8 U.S.C. § 1182(f), as “significant negative factors when reviewing immigration requests.”⁵

281. USCIS concurrently issued a press release tying this guidance to the National Guard attack, declaring that “U.S. Citizenship and Immigration Services issued new guidance allowing for negative, country-specific factors to be considered when vetting aliens from 19 high-risk countries” “in the wake of the shooting of two National Guard service members in Washington D.C. Wednesday by an Afghan National.”

282. Six days after the attack, on December 2, 2025, USCIS released a new policy memorandum, PM-602-0192, which 1) places a hold on all asylum applications, regardless of nationality, pending a comprehensive review of the process, 2) places an indefinite hold on benefit requests for noncitizens from countries listed in Presidential Proclamation 10949, which restricts the entry of noncitizens into the United States from certain countries, and 3) mandates that USCIS “[c]onduct a comprehensive re-review of approved benefit requests for aliens from

⁵ U.S. Citizenship & Immigration Servs., *USCIS Implements Additional National Security Measures in the Wake of National Guard Shooting by Afghan National* (Nov. 27, 2025), <https://www.uscis.gov/newsroom/news-releases/uscis-implements-additional-national-security-measures-in-the-wake-of-national-guard-shooting-by-afghan-national>

countries listed in PP 10949 who entered the United States on or after January 20, 2021.”⁶

283. Twenty-one days (about 3 weeks) after the attack, on December 16th, 2025, the President announced an expansion as to which countries would be subject to entry restrictions pursuant to 8 U.S.C. § 1182(f). Proclamation No. 10,998, *Restricting and Limiting the Entry of Foreign Nationals to Protect the Security of the United States*, 90 Fed. Reg. 59,717 (Dec. 19, 2025). Concurrently, announcements from leadership of USCIS suggested that upon those entry restrictions’ effective date, January 1, 2026, the “negative factors” policy alert and the “benefits pause” policy memo would be extended to these additional countries.⁷ That suggestion proved true when USCIS issued a supplemental

⁶ U.S. Citizenship & Immigration Servs., Policy Alert PM-602-0192: Pending Applications—High-Risk Countries (Dec. 2, 2025), <https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf>

⁷ U.S. Citizenship & Immigr. Servs. (@USCIS), *Under President Trump and Secretary Noem's decisive leadership, USCIS is ensuring all aliens from high risk countries are vetted and screened to the maximum degree possible. The safety and security of the American people always comes first. USCIS is conducting a comprehensive review of anyone from anywhere who poses a threat to the U.S., including those identified in the President's latest proclamation to restore law and order in our nation's immigration system*, X (Dec. 18, 2025).

Policy Memorandum extending the restrictions imposed by Policy Memorandum PM-602-0192, through which USCIS further expanded its ban.⁸

284. The fatal shooting of a member of the National Guard is tragic. However, the snap judgment and breakneck speed by which USCIS implemented sweeping policies and massive changes following this tragedy evinces the lack of consideration for, of pre-planning of, these massive, draconian restrictions to the legal immigration system that essentially blame foreign nationals simply because of where they where they were born. It took less than 24 hours for the first Policy Alert to be created and implemented. It took less than a week for the Policy Memorandum. While Plaintiffs understand the need for safe and orderly immigration, Defendants may not abrogate their statutory duty in the name of national security.

285. And indeed, there is ample evidence that DHS and USCIS have intended large-scale restrictions on lawful immigration pathways for some time, with this tragic shooting simply being a pretextual reason for implementing draconian restrictions.⁹ In October 2025, the official DHS account on X.Com posted the

⁸ See U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0194, *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries* (Jan. 1, 2026).

⁹ See, e.g., Department of Homeland Security. (@DHSGov), *X.com* (Nov. 12, 2025) (citing net negative migration as a reason to celebrate, and reviewing several policies restricting lawful migration pathways, such as termination of Temporary Protected Status and restricted validity for Employment Authorization Documents,

word “Remigrate,”¹⁰ and immediately following the tragic shooting, the official account of DHS posted “The stakes have never been higher, and the goal has never been more clear: Remigration now.”¹¹ This phrasing is important, and a stark contrast from wording typically used, such as “removal” or “deportation,” as it is linked to dangerous far right ideology and defined as “a soft type of ethnic cleansing under the guise of deportation and segregation.”¹²

Legal Background

286. This action challenges three policies: (1) USCIS Policy Alert PA-2025-26, which directs USCIS officers to consider “relevant country-specific facts” as “significant negative factors” in adjudicating discretionary immigration benefits requests filed by aliens from the 19 countries enumerated in Presidential Proclamation 10949 (“negative factors policy alert”);¹³ (2) USCIS Policy Memorandum 602-0192’s “hold on pending benefits requests” for nationals from the same 19 countries (hereinafter “the benefits ban”); and (3) USCIS

as positive policy changes under the same thread).

<https://x.com/DHSgov/status/1988759137044382119>

¹⁰ Department of Homeland Security, (@DHSGov), *X.com* (Oct. 14, 2025)

<https://x.com/DHSgov/status/1978175527329358094>.

¹¹ Department of Homeland Security, (@DHSGov), *X.com* (Nov. 28, 2025)

<https://x.com/DHSgov/status/1994445836915253664>.

¹² José Ángel Maldonado, Manifestx: Toward a Rhetoric Loaded with Future, 17 *Communication and Critical/Cultural Studies* 104 (2020).

¹³ Afghanistan, Myanmar, Chad, the Republic of Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan, Yemen, Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan and Venezuela.

Policy Memorandum PM-602-0194, which extends policies (1) and (2) to the 20 additional countries identified in Presidential Proclamation 10998.¹⁴

287. Plaintiffs similarly challenge the collateral consequences that additional mandates in the Policy Memoranda bring, such as the added delays that Plaintiffs will face as policies and procedures undergo a wholesale re-review and the re-adjudication of benefit requests for Plaintiffs and similarly situated individuals approved on or after January 20, 2021.

288. Presidential Proclamations 10998 and 10949 were issued on June 4, 2025 and December 16, 2025 respectively, and jointly prohibit *entry* of foreign nationals from the 39 countries listed.¹⁵ The Proclamations do not, however, directly prevent those foreign nationals from obtaining immigration benefits if they have already entered the United States and are therefore within the U.S. when making their requests. Those latter restrictions on stateside immigration benefits stem from the three policies mentioned above. Accordingly, this action does not challenge Presidential Proclamations 10998 and 10949 restrictions on visa issuance and entry of foreign nationals.

¹⁴ Burkina Faso, Mali, Niger, South Sudan, Syria, Angola, Antigua and Barbuda, Benin, Cote d'Ivoire, Dominica, Gabon, The Gambia, Malawi, Mauritania, Nigeria, Senegal, Tanzania, Tonga, Zambia, and Zimbabwe.

¹⁵ The impacted countries are: Afghanistan, Myanmar, Chad, the Republic of Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan, Yemen, Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan and Venezuela from PP 10949 and Burkina Faso, Mali, Niger, South Sudan, Syria, Angola, Antigua and Barbuda, Benin, Cote d'Ivoire, Dominica, Gabon, The Gambia, Malawi, Mauritania, Nigeria, Senegal, Tanzania, Tonga, Zambia, and Zimbabwe from PP 10998

289. USCIS employs Presidential Proclamations 10998 and 10949 as its basis for the negative factors policy alert, the benefits ban, and the subsequent extension of those two policies to 20 countries. *See* U.S. Citizenship & Immigr. Servs., Policy Alert PA-2025-26, *Impact of INA 212(f) on USCIS' Adjudication of Discretionary Benefits* (Nov. 27, 2025) (“U.S. Citizenship and Immigration Services (USCIS) is issuing policy guidance in the USCIS Policy Manual addressing the President’s recent exercise of his authority under section 212(f) of the Immigration and Nationality Act (INA) through Presidential Proclamation 10949, ‘Restricting the Entry of Foreign Nationals To Protect the United States from Foreign Terrorists and Other National Security and Public Safety Threats’ (PP 10949) and its impact on USCIS adjudications.”) (emphasis added); U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0192, *Hold and Review of All Pending Asylum Applications and All USCIS Benefit Applications Filed by Aliens from High-Risk Countries* (Dec. 2, 2025) (“[T]his memorandum directs U.S. Citizenship and Immigration Services (USCIS) personnel to . . . [p]lace a hold on pending benefit requests for aliens from countries listed in *Presidential Proclamation (PP) 10949, Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats* . . . In light of identified concerns and the threat to the American people, USCIS has determined that a

comprehensive re-review, potential interview, and re-interview of all aliens from high-risk countries of concern who entered the United States on or after January 20, 2021 is necessary.”). *See also* U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0194, *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries* (Jan. 1, 2026) (“ . . . the flow of aliens from countries with high overstay rates, significant fraud, or both must stop. To address potential vulnerabilities, USCIS will place an adjudicative hold on all pending benefit requests submitted by or for aliens from the high-risk countries identified in PP 10998.”).

290. While this action does not contest the restrictions on *entry* imposed by Presidential Proclamations 10998 and 10949, this action does challenge USCIS’ subsequent application of Presidential Proclamations 10998 and 10949 to stateside immigration benefits. We therefore turn our attention to the underlying legal rationale of Presidential Proclamations 10998 and 10949, which restrict entry to the United States under 8 U.S.C. § 1182(f), before then examining the three policies at issue.

A. 8 U.S.C. § 1182(f) and the President’s Authority to Suspend Entry of Noncitizens

291. 8 U.S.C. § 1182(f) (Section 212(f) of the Immigration and Nationality Act) allows the President to “suspend the entry of all aliens or any class of aliens as

immigrants or nonimmigrants” or “impose on the entry of aliens any restrictions he may deem to be appropriate” “[w]henver the President finds that the entry of any aliens or of any class of aliens into the United States would be detrimental to the interests of the United States.” This provision endows the President with broad authority to prevent specific groups of foreign nationals from entering the U.S., subject only to the restrictions that the President must (1) first find that these nationals’ entry would be detrimental to the U.S. and (2) that the entry ban not be indefinite. *Trump v. Hawaii*, 585 U.S. 667, 686 (2018) (“We agree with plaintiffs that the word ‘suspend’ often connotes a ‘defer[ral] till later’.”).

292. This authority operates only within its “sphere.” *Hawaii*, 585 U.S. at 680. Specifically, the “plain language” of 8 U.S.C. § 1182(f) permits bans on the “entry of alien into the United States,” which necessarily implies that 8 U.S.C. § 1182(f) may only be used to “define[] the universe of aliens who are admissible into the United States (and therefore eligible to receive a visa),” where “admissible” refers to whether a foreign national may lawfully enter the U.S. *Hawaii*, 585 U.S. at 686-87 (citing 8 U.S.C. § 1101(a)(13)(A) to define admission). The spheres of immigration law that govern noncitizens prior to entry into the United States and those who have already entered the United States are significant, and the Supreme Court is clear that, especially for those *already*

in the U.S., courts should “assume that § 1182(f) does not allow the President to expressly override particular provisions of the INA.” *Hawaii*, 585 U.S. at 682.

293. Courts applying 1182(f) have consistently declined to extend its ambit into the adjudication of stateside immigration benefits. *U.S. East Bay Sanctuary Covenant*, 932 F.3d at 773 (§ 1182(f) could not provide legal authority for a rule barring foreign nationals who illegally entered the U.S. from applying for asylum because it “imposes the penalty on aliens already within our borders,” which does not “concern the suspension of entry or otherwise ‘impose on the entry of aliens . . . restrictions [the President] deem[s] to be appropriate.’”); *Refugee & Immigrant Ctr. for Educ. & Legal Servs. v. Noem*, No. 25-cv-306 (RDM), 2025 WL 1825431, at 73 (D.D.C. July 2, 2025) (rejecting the arguments that 1182(f) endows the Executive with “implied authority” over deportation proceedings and that “the President’s authority under § 1182(f) is delegable to USCIS.”); *President & Fellows of Harvard Coll. v. DHS*, 78 F. Supp. 3d 182, 196 (D. Mass. June 23, 2025) (preliminarily enjoining an 1182(f) travel ban on international students seeking to attend Harvard University because “the statute’s purpose is to regulate and influence conduct abroad, rather than at home” and noting that courts have “expressed skepticism that the President’s authority under § 1182(f) is as extensive when it is aimed at domestic policy.”).

294. "[O]ur immigration laws have long made a distinction between those aliens who have come to our shores seeking admission . . . and those who are within the United States after an entry, irrespective of its legality. In the latter instance, the Court has recognized additional rights and privileges not extended to those in the former category who are merely ‘on the threshold of initial entry.’” *Leng May Ma v. Barber*, 357 U.S. 185, 187 (1958) (emphasis added); *see also Zadvydas v. Davis*, 533 U.S. 678, 693 (2001) (“The distinction between an alien who has effected an entry into the United States and one who has never entered runs throughout immigration law. . . . [O]nce an alien enters the country, the legal circumstance changes, for the Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.”). Foreign nationals already present within the U.S. can thus apply for a panoply of immigration benefits, each of which are governed by statutory schemes outside § 1182(f)’s reach.

B. Immigration Process within the United States

295. Once a noncitizen has entered the United States, their immigration status and immigration benefits depend on the classification of immigrant or nonimmigrant they were admitted as or have adjusted to while in the U.S.. Congress has decided, as a matter of policy, to allow individuals in the United States to apply for benefits after entry. The process through which they apply for immigration

benefits similarly depends on what benefit is being requested. Relevant to this litigation are the following major categories.¹⁶

i. Naturalization

296. To naturalize as a U.S. citizen, an applicant must satisfy certain eligibility criteria under the INA and its implementing regulations. *See generally* 8 U.S.C. §§ 1421-1458; 8 C.F.R. §§ 316.1-316.14.

297. Applicants must prove that they are at least 18 years of age, have resided continuously in the United States for at least five years after being lawfully admitted to the United States—in other words, must have been a lawful permanent resident of the United States for at least five years—and have been physically present in the United States for at least half of that time. 8 U.S.C. § 1427(a)(1). Similarly, applicants must demonstrate “good moral character” for the five years preceding the date of application, attachment to the “principles of the Constitution of the United States” and a favorable disposition toward the “good order and happiness of the United States.” 8 C.F.R. § 316.2(a)(7).

¹⁶ Please note that in addition to the main categories listed here, there are numerous ancillary benefits that require application with USCIS, such as applications for work authorization (I-765), applications for travel authorization (I-131), applications for “Temporary Protected Status” and various forms of deferred action or humanitarian parole. While Plaintiffs list these four major immigration benefit requests, this case challenges the pause to any and all benefit pauses that Plaintiffs are experiencing as a result of the policy memoranda.

298. Once an individual submits an application for naturalization, USCIS conducts a background check, which includes a full criminal background check by the Federal Bureau of Investigation. 8 U.S.C. § 1446(a); 8 C.F.R. §§ 335.1-335.2. After completing the background check, USCIS must schedule a naturalization examination at which the applicant meets with a USCIS examiner for an interview.

299. In order to avoid inordinate processing delays, naturalization applications are one of the few application categories for which Congress has set express statutory timeframes. Not only has Congress expressed the generalized “sense of Congress” that the processing of an immigration benefit application “should be completed not later than 180 days after the initial filing of the application,” 8 U.S.C. § 1571(b), but also USCIS is tasked with either granting or denying a naturalization application within 120 days of the date of the examination. 8 U.S.C. § 1447(b) (permitting *de novo* judicial hearings for naturalization applications for which over 120 days have elapsed since the examination); 8 C.F.R. § 335.3.

300. Importantly, there is no discretion in the adjudication of a naturalization application. If the applicant has complied with all requirements for naturalization, federal regulations state that USCIS “*shall* grant the application.” 8 C.F.R. § 335.3(a) (emphasis added).

301. Furthermore, courts have long recognized that “Congress is given power by the Constitution to establish a uniform Rule of Naturalization . . . And when it establishes such uniform rule, those who come within its provisions are entitled to the benefit thereof as a matter of right. . . .” *Schwab v. Coleman*, 145 F.2d 672, 676 (4th Cir. 1944); *see also Marcantonio v. United States*, 185 F.2d 934, 937 (4th Cir. 1950) (“The opportunity having been conferred by the Naturalization Act, there is a statutory right in the alien to submit his petition and evidence to a court, to have that tribunal pass upon them, and, if the requisite facts are established, to receive the certificate.”) (quoting *Tutun v. United States*, 270 U.S. 568, 578 (1926))).

302. Once an application is granted, an applicant must attend an oath ceremony, and upon giving the oath of allegiance at such a ceremony, is officially a citizen of the United States.

ii. Adjustment of Status

303. Federal law similarly allows for certain noncitizens to “adjust their status” from a given nonimmigrant status to that of a lawful permanent resident (“LPR”) of the United States.

304. These could be, among others, individuals for whom a family member has filed a petition for their permanent residence, or for whom an employer has filed a petition for their permanent residence. 8 U.S.C. § 1255(a); 8 C.F.R. § 245.1.

305. A noncitizen who is the beneficiary of such an approved petition (an “immigrant visa petition”) and who is physically present in the United States may adjust their status to that of an LPR if he or she “makes an application for such adjustment,” was “inspected and admitted or paroled” into the United States, is eligible for an immigrant visa, is admissible to the United States, and an immigrant visa is immediately available to the applicant at the time the application is filed. 8 U.S.C. §§ 1255(a)(1)-(3); 8 C.F.R. § 245.1.

306. An adjustment of status applicant may be found inadmissible, and therefore ineligible to become an LPR, if certain conditions, such as serious criminal history, past immigration violations, or fraud or misrepresentations to a U.S. government official, are found. *See* 8 U.S.C. § 1182(a). Further, adjustment of status is explicitly a discretionary benefit by statute. 8 U.S.C. § 1255(a) (“The status of [an eligible noncitizen] *may* be adjusted by the Attorney General, in his discretion and under such regulations as he may prescribe, to that of an alien lawfully admitted for permanent residency.”).

307. The process for obtaining LPR status in this manner begins with the filing of an application to adjust status (8 C.F.R. § 245.2(a)(1)), followed by biometrics and background checks on the applicant conducted by USCIS,¹⁷ and culminates in an in-person interview with a USCIS adjudicator. 8 C.F.R. § 245.6. Upon

¹⁷ USCIS Policy Manual, Vol. 1, Pt. C, Ch. 2 (Biometrics Collection)

approval of this individual's application after interview (or where interview is waived), the individual becomes a lawful permanent resident of the United States and will receive a card evincing such status (a "green card").¹⁸

308. While no explicit statutory deadline is given for the adjudication of such applications, Congress has expressed that it is the sense of Congress that such immigration benefit applications be processed within 180 days. 8 U.S.C. § 1571(b).

iii. Change and Extension of Nonimmigrant Status

309. Certain noncitizens within the United States are similarly able to apply to either change the nonimmigrant status under which they were initially admitted, extend that status, or, where required, amend the terms of that nonimmigrant status.

310. Formal immigration statuses are many. Nonimmigrant visa classifications range from the letter A to the letter V, with subcategories under nearly all classifications. *See* 8 U.S.C. § 1101(a)(15)(A)-(V). These statuses range from the F-1 "student" status to the H-2A "agricultural worker" status to the O-1 "extraordinary ability" status. There are also statuses created by treaty, such as

¹⁸ USCIS Policy Manual, Vol. 7, Pt. A, Ch. 1 (Purpose and Background) ("USCIS issues a permanent resident card (Form I-551) (commonly called a green card) to the successful adjustment applicant as proof of such immigrant status.").

the “Trade National” TN status that accompanies NAFTA (now the U.S. Mexico Canada Agreement), 8 U.S.C. § 1184(e)(1), and statuses designated by executive action, such as Temporary Protected Status (TPS). 8 U.S.C. § 1254a(b)(1), 8 C.F.R. § 244.2(a), (f).

311. These statuses are almost all time limited, with an expiration on the specific amount of time being provided by the Department of Homeland Security that a noncitizen may be in that status before being required to depart the United States or apply to extend their status. The availability and requirements for such extensions are governed by the regulations underlying those particular statuses, 8 C.F.R. § 214.2, but are generally done by filing a form with the USCIS, having biometrics taken, and ultimately having an adjudicator working at one of USCIS’s Service Centers giving final approval of the extension of status.¹⁹

312. Changes of status follow a similar path, where an applicant complies with the regulatory requirements for the immigration classification, filing the requisite petition and evidence, and then, after the relevant biometrics and background checks are taken, having an adjudicator at a USCIS Service Center deciding the Change of Status petition.²⁰ If approved, the individual’s immigration status

¹⁹ U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 2, Pt. A, Ch. 4 (Extension of Stay or Change of Status).

²⁰ U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 2, Pt. A, Ch. 4 (Extension of Stay or Change of Status); *see also* 8 U.S.C. § 1258; 8 C.F.R. § 248.1.

within the United States is officially changed to the new classification, and the rights, benefits, and responsibilities that accompany the new status take effect.

313. Importantly, an approved change in nonimmigrant status or extension of nonimmigrant status that one already holds does not require travel outside of the United States. 8 C.F.R. § 248.1(a) (“any alien lawfully admitted to the United States,” subject to certain exceptions, “may be accorded nonimmigrant status in the United States.”); U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 2, Pt. A, Ch. 4 (Extension of Stay or Change of Status) (“Generally, certain nonimmigrants present in the United States admitted for a specified period of time, or their petitioners, may request an extension of their admission period in order to continue to engage in those activities permitted under the nonimmigrant classification in which they were admitted.”). In other words, there is no new entry requirement for an individual who has been approved for a change or extension of status, and therefore entry restrictions tied to INA § 212(f), 8 U.S.C. § 1182(f), do not apply.

314. While no explicit statutory deadline is given for the adjudication of nonimmigrant applications, Congress has expressed that it is the sense of Congress that such immigration benefit applications be processed within 30 days. 8 U.S.C. § 1571(b).

iv. Asylum

315. Asylum applications are made in two manners: affirmative asylum applications and defensive asylum applications. As relevant to this litigation, affirmative asylum applications are made directly with USCIS, and are impacted by the challenged policies, whereas defensive asylum applications are made in immigration court at the Executive Office for Immigration Review, under the Department of Justice, and are not impacted by the challenged policies.

316. Generally speaking, asylum is a form of protection provided by the Refugee Act of 1980, which was thereafter incorporated into the INA. Pub. L. No. 96-212, 94 Stat. 102 (1980). This benefit provides protection and lawful immigration status to those who are able to demonstrate that they possess a “well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion” in their country of origin. 8 U.S.C. §§ 1101(a)(42); 1158(b)(1)(A); *see also* 8 C.F.R. §§ 208.1, 1208.1. Once granted asylum, an individual generally cannot be deported to their country of origin or to any other country absent subsequent unlawful conduct, evidence of fraud in the asylum application, or a fundamental change in country conditions. 8 U.S.C. § 1158(c)(2); 8 C.F.R. §§ 208.24, 1208.24.

317. Further, once an individual is granted asylum, they are generally eligible to adjust their status to that of a lawful permanent resident by application so long as they 1) have been physically present in the United States for at least one year

after being granted asylum; 2) continue to meet the requirements for their asylum grant (in other words, they still meet the legal definition of “refugee”); 3) have not resettled in any foreign country; and 4) are admissible to the United States as an immigrant. 8 U.S.C. § 1159(b).

318. The application process for receiving asylum status can be a long one, however. For an “affirmative” asylum application, an individual first makes an application with the USCIS, providing the reason for which they are claiming asylum on the requisite form, and providing evidence as to how they meet the qualifications for asylum set forth above. U.S. Citizenship & Immigr. Servs., *Affirmative Asylum Procedures Manual* (Feb. 2025) . Current backlogs on affirmative asylum applications exceed one million, with the Office of the Inspector General specifically flagging that such backlogs mean that “eligible affirmative asylum applicants will be delayed in obtaining not only asylum, but also related immigration benefits, such as lawful permanent residency and citizenship.”²¹ While official statistics on wait times for affirmative asylum applicants are not provided by the government, independent sources suggest

²¹ U.S. Dep’t of Homeland Sec., Office of Inspector Gen., *USCIS Faces Challenges Meeting Statutory Timelines and Reducing Its Backlog of Affirmative Asylum Claims*, Report No. OIG-24-36 (July 3, 2024), <https://www.oig.dhs.gov/sites/default/files/assets/2024-07/OIG-24-36-Jul24.pdf>

wait times in excess of six years between the time an application is made and the time an interview notice is received.²²

319. Congress has set statutory timetables for the adjudication of affirmative asylum applications, stating that, absent extraordinary circumstances, initial interviews or hearings “shall commence not later than 45 days after the date an application is filed” and that final adjudication of the application, excluding appeal, “shall be completed within 180 days after the date an application is filed.” 8 U.S.C. § 1158(d)(5)(A). That said, courts have routinely found that massive backlog and rate of asylum applications made are sufficiently extraordinary circumstances, and that the timetable set by Congress is not mandatory on the agency as a result. *See, e.g., Fangfang Xu v. Cissna*, 434 F Supp. 3d 43 (S.D.N.Y. 2020)

C. “Negative Factors” Policy Alert

320. Many immigration benefits require the applicant to both meet the statutory eligibility criteria and separately establish that the applicant “merits a favorable exercise of discretion.” U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis). Requests with a discretionary

²² Hum. Rts. First, *Saving Lives, Ending Inefficiencies: Steps to Strengthen the U.S. Asylum Adjudication System* 1 (2024)

component include applications to extend or change nonimmigrant status, obtain asylum, obtain some work authorizations, and adjust status. *Id.*

321. Prior to the “Negative Factors” Policy Alert, the factors used in this discretionary analysis related to an applicant’s individual conduct and circumstances. Factors used in this discretionary analysis included, for example, an applicant’s ties to family members in the United States, value and service to the community, history of employment, and history of taxes paid. *Id.*

322. On November 27, 2025, USCIS issued Policy Alert PA-2025-26, which updated the USCIS Policy Manual to add “[r]elevant country-specific facts and circumstances, such as insufficient vetting and screening information” to this list of discretionary factors. *Id.* These country-specific facts are to be considered “as a significant negative factor when making an individual assessment in weighing discretion.” *Id.*

323. Unlike the above-mentioned discretionary factors, which relate to an applicant’s conduct, these “significant negative factors” are based on practices by the government of an applicant’s home country. For example, the Policy Manual provides that a “significant negative factor” applicable to migrants from “Afghanistan, Eritrea, Libya, Somalia, Sudan, Yemen, and Venezuela” is that their governments “lack a competent or central authority for issuing passports and civil documents.” U.S. Citizenship & Immigr. Servs., Policy Manual, Vol.

1, Pt. E, Ch. 8 (Discretionary Analysis). Since submission of such civil documents is a required part of many immigration benefit applications, *see* 8 C.F.R. § 103.2(b)(1), the Policy Manual necessarily implies that nationals of Afghanistan, Eritrea, Libya, Somalia, Sudan, Yemen, and Venezuela are automatically deemed to have a “significant negative factor” attached to the adjudication of their application because of their birthplace.

324. Additionally, the Policy Manual appears to instruct officers to deny applications because a person’s documentation from certain countries may be deemed unreliable, which government’s “directly relates to USCIS’ ability to meaningfully assess eligibility for benefit requests.” U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis) (emphasis added). This specific logic was used, despite the fact that these individuals are already lawfully in the United States, presuming that some officials, either at USCIS or the Department of State already reviewed these identity documents and were satisfied as to their authenticity.

325. USCIS subsequently confirmed that this section of the Policy Manual treats inability to “establish their identity as outlined in PP 10949” as part of its now-standard “thorough review” “to assess benefits eligibility” for foreign nationals of the 39 countries. U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0192, *Hold and Review of All Pending Asylum Applications and All*

USCIS Benefit Applications Filed by Aliens from High-Risk Countries (Dec. 2, 2025) (emphasis added).

326. Similarly, the Policy Manual provides that “country-specific concerns relate[d] to a high rate of overstay” “may impact an officer’s determination of likelihood that a particular individual may overstay.” U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis). Of course, certain applicants subject to the policy have already remained in the United States and obtained permanent residency or other forms of nonimmigrant status that provide a pathway to a permanent residency or naturalization. And those with pending status changes or applications have already proven they do not intend to overstay by applying to the USCIS!

327. Eligibility for immigration benefits already requires showing that one has not committed fraud, a disqualifying criminal offense, and provision of civil documents. Because failure to establish eligibility is and has always been a wholly sufficient basis to deny an application, it is unclear what function the above “discretionary” guidance serves beyond creating a pathway and incentives to deny applications based on statutory eligibility grounds under the guise of “discretion.”

328. Apart from the factors enumerated in the Policy Manual, USCIS notes that it will “consider any country-specific facts and circumstances outlined” in either

(1) Presidential Proclamation 10949, including any amendments or (2) any subsequent exercise of Presidential authority under INA § 212(f). U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis), at Footnote 76. Each pathway provides additional factors adjudicators are directed to consider.

329. First, Presidential Proclamation 10949 declares that the “foreign policy, national security, and counterterrorism objectives of the United States” require that the President “fully restrict” or “partially restrict” the “entry of nationals” from 19 countries based on these countries’ “screening and vetting capabilities, information sharing policies, and country-specific risk factors—including whether each country has a significant terrorist presence within its territory, its visa-overstay rate, and its cooperation with accepting back its removable nationals.” Proclamation No. 10,949, *Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats*, 90 Fed. Reg. 24,497 (June 10, 2025).

330. Second, the President issued Presidential Proclamation 10998 on December 16, 2025, imposing an INA § 212(f) travel ban on 20 additional countries. Proclamation No. 10,998, *Restricting and Limiting the Entry of Foreign Nationals to Protect the Security of the United States*, 90 Fed. Reg. 59,717 (Dec. 19, 2025). Some country-specific facts and circumstances alleged as bases for

this travel ban—which the above-cited USCIS guidance instructs officers to “consider” in their discretionary analysis—include (1) that “foreign nationals from countries named in this proclamation have been involved with crimes that include murder, terrorism, embezzling public funds, human smuggling, human trafficking, and other criminal activity”; (2) vetting deficiencies, including “poor civil documentation and recordkeeping practices, widespread corruption and fraud, unreliable or inaccessible criminal records, and unreliable government travel documents”; and (3) that “some of these countries have offered Citizenship by Investment (CBI) without residency, which poses challenges for screening and vetting purposes.” *Id.*

331. Relatedly, USCIS extended the “significant negative factors” memo to the 20 additional countries identified in Presidential Proclamation 10998, declaring USCIS’ intent to “stop” the “flow of aliens from countries with high overstay rates, significant fraud, or both” through “an adjudicative hold on all pending benefit requests submitted by or for aliens from the high-risk countries identified in PP 10998.” Policy Memorandum PM-602-0194, *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries* (Jan. 1, 2026). The memo then elaborates that “[m]any of these restricted high-risk countries experience widespread corruption, unreliable or fraudulent civil documents and criminal records, and lack effective birth registration systems,

which systematically hinder accurate vetting and identity verification. Officers must consider these country-specific factors.” *Id.* But, again, all of the Plaintiffs are already inside the US, having had their documents vetted by the Department of State, or previously by the USCIS.

332. Despite announcing its intent to “stop” the “flow of aliens from countries with high overstay rates, significant fraud, or both,” USCIS nonetheless maintains that “[t]he mere fact that an individual is from a country subject to INA 212(f) restrictions on entry or admission, however, is not by itself a significant negative factor.” U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis).

D. “Benefits Pause” Policy Memoranda

333. Prior to the issuance of the Policy Memoranda banning immigration benefits from the 39 countries listed in Presidential Proclamation 10998, USCIS relied on a lengthy “vetting” process to adjudicate immigration benefit applications. First, as noted *supra*, USCIS routinely collects biometric information from applicants for immigration benefits. This biometric information is used to “conduct background and security checks, adjudicate immigration and naturalization benefits, and perform other functions related to administering and enforcing the immigration and naturalization laws.” 8 C.F.R. 103.16(a).

334. Second, USCIS runs the applicant's name and biometric information through a variety of security-related checks, which include "conducting fingerprint-based background checks, requesting a name check from the Federal Bureau of Investigation (FBI), and other DHS or inter-agency security checks." U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. C, Ch. 1 (Purpose and Background).

335. These security checks are largely automatic. The DHS notes that it developed a "platform called ATLAS to automate and streamline the screening of biographic and biometric information received from immigration benefit applicants," which "has the ability to compare application information against customs, immigration, terrorism, and counterterrorism information held in U.S. Government systems using **computer automation**, rather than manual system checks, to identify potential derogatory information that matches entries in DHS vetting systems **as new information is discovered**, and to **preemptively notify USCIS personnel** with a role in the immigration vetting process." U.S. Dep't of Homeland Sec., U.S. Citizenship & Immigr. Servs., Privacy Impact Assessment for Continuous Immigration Vetting (CIV), DHS/USCIS/PIA-076 (Feb. 2019) (emphasis added).²³

²³ https://www.dhs.gov/sites/default/files/publications/pia-uscis-fdnsciv-february2019_0.pdf

336. The ‘derogatory information’ refers to anything indicating “potential fraud, public safety, and national security concerns.” *Id.* at 23. ATLAS is integrated with ATS, a Customs and Border Protection tool which “compares traveler, cargo, and conveyance information against law enforcement, intelligence, and other enforcement data using risk-based scenarios and assessments.” *Id.*

337. Third, if ATLAS identifies a fraud or national security concern, the case is escalated to USCIS’ Fraud Detection and National Security unit. This step is initially automatic: ATLAS issues a database inquiry, “filters the results through its rules engine to identify possible national security concerns, and then transmits the completed results to the end-user in the form of a SGN [system generated notification] viewable in the FDNS-DS system.” *Id.* at 7. The subsequent step is manual: FDNS then “manually review[s] each hit to confirm the validity, relevancy, and accuracy of information and to determine if the information is actionable.” *Id.* at 8. Subsequent action by USCIS and ICE personnel is then coordinated by FDNS. *Id.*

338. On December 2, 2025, USCIS issued Policy Memorandum PM-602-0192, modifying the above process by directing agency personnel to (1) place an immediate hold on all Form I-589 regardless of applicant’s nationality; (2) place an immediate hold on all immigration benefits applications filed by nationals of the 19 countries listed in Presidential Proclamation 10949; and (3) re-review

previously approved immigration benefits for nationals of the countries listed in Presidential Proclamation 10949 who entered the U.S. on or after January 20, 2021. U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0192, *Hold and Review of All Pending Asylum Applications and All USCIS Benefit Applications Filed by Aliens from High-Risk Countries* (Dec. 2, 2025).

339. This adjudicatory hold encompasses, for example, adjustment of status applications, employment authorization extensions, and other case types filed by nationals of designated countries regardless of how long they lived in the United States. USCIS has made it clear that no final decisions will be issued on these cases until further notice.

340. Notably, this USCIS hold policy applies to cases under USCIS's purview, including affirmative asylum applications and other domestic benefit adjudications, but it does not directly control asylum cases being heard in the Immigration Courts. In practice, however, the memorandum's across-the-board hold has profound effects on both affirmative and defensive asylum processing. Many asylum seekers begin by applying affirmatively with USCIS, yet under this policy those cases will not be decided or referred onward to the Immigration Court, leaving applicants in legal limbo with no forum to have their claims heard.

341. The review and/or re-review stage consists of four prongs, which are:

1. The alien is listed in the Terrorist Screening Dataset (TSDS) as a Known or Suspected Terrorist (KST) under Tier 1 or Tier 2 classifications or is included in Tier 3 or Tier 4 of the TSDS with significant derogatory information related to the alien.
2. The alien is connected to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B) of the Immigration and Nationality Act (INA).
3. The alien is linked to prior, current, or planned involvement in, or association with, an activity, individual, or organization that may pose a risk of serious harm or danger to the community, including criminal conduct described in INA 101(a)(43), 212(a)(1)(A)(iii), 212(a)(2), 237(a)(2), or 237(a)(4)(A)(ii).

The alien is unable to establish their identity as outlined in PP 10949.*Id.*

342. Each of the four prongs is described as an example of how agency personnel should “**assess benefit eligibility**” to “ensure that all asylum applicants and aliens from high-risk countries of concern who entered the United States do not pose a threat to national security or public safety.” *Id.* (emphasis added).
343. Despite the Policy Memorandum’s declaration that these four prongs are to be used to “assess benefits eligibility,” the basis for benefits eligibility is already specified in the statute and regulations:

- a. Prong 1 is governed by INA § 212(a)(3)(B), 8 U.S.C. § 1182(a)(3)(B), (deeming inadmissible an alien who “has engaged” or “is likely to engage” in “terrorist activity,” who an adjudicator “knows” “or has reasonable grounds to believe” will do the same, is a “representative” of a “terrorist organization,” is a member of a “terrorist organization,” “endorses or espouses terrorist activity,” has “received military-type training” from a “terrorist organization,” or is the spouse of child of anyone who did the above).
- b. Prong 2 notes the statutory criteria it is governed by—INA § 212(a)(3)(A), (B), or (F), 8 U.S.C. § 1182(a)(3)(A), (B) or (F); or 237(a)(4)(A) or (B), 8 U.S.C. § 1227(a)(3)(A), (B), or (F)—which refers to aliens whom an adjudicator “knows or has reasonable ground to believe” will engage in espionage, sabotage, export of sensitive technology or information, unlawful activity, or the overthrow of the U.S. government.
- c. Prong 3 “includes” (but does not limit) its application to security-related inadmissibility grounds: INA § 101(a)(43), 8 U.S.C. § 1101(a)(43), (aggravated felony), § 212(a)(1)(A)(iii), 8 U.S.C. § 1182(a)(1)(A)(iii), (physical or mental disorder), § 212(a)(2), 8 U.S.C. § 1182(a)(2), (convicted of, or who admits the essential acts constituting, a crime, § 237(a)(2), 8 U.S.C. § 1227(a)(2), (conviction for a crime involving

turpitude), or § 237(a)(4)(A)(ii), 8 U.S.C. § 1227(a)(4)(A)(ii), (having “engaged” in “other criminal activity which endangers public safety or national security.”).

- d. Prong 4’s concern regarding identity documents is governed by 8 USC § 1182(a)(7)(A)(i), deeming “inadmissible” aliens without a “valid unexpired passport.”

344. The Policy Memorandum effectively modifies these statutory criteria with capacious phrases undefined by statute or regulation:

- a. Prong 1 appears to bar immigration benefits for those who are on “Tier 3 or Tier 4 of the Terrorism Screening Dataset” when there is “significant derogatory information.” There does not appear to be any public information regarding how determinations for placement onto Tiers 1 through 4 of the Terrorism Screening Dataset are conducted, raising questions as to whether and how these Terrorism Screening Dataset lists comport with the terrorism inadmissibility grounds. In any event, USCIS does not define the phrase “significant derogatory information,” so it is unclear how the Policy Memorandum interacts with the statutory grounds of inadmissibility.
- b. Prong 2 appears to broaden national security inadmissibility grounds to include anyone who is “**connected to** an organization” which has engaged

in or will engage in espionage, sabotage, violation of export controls, unlawful activity, or the overthrow of the U.S. government. The phrase “connected to” is not a statutory or regulatory term of art, and its capacious definition is not limited by the Policy Memorandum.

- c. Prong 3 appears to broaden criminal inadmissibility grounds to anyone who is “linked to” or “associated with” any individual who has committed such criminal offenses. Again, these phrases are not statutory or regulatory terms of art, and their capacious definitions are not narrowed by the Policy Memorandum.
- d. Prong 4 appears to expand the lack-of-documentation inadmissibility ground to include applicants whose “unexpired passports” do not meet Presidential Proclamation 10998’s newly announced expectations regarding identity documents. It appears USCIS’s stance is that individuals from countries which Presidential Proclamation 10998 declares do not issue reliable identity documents *cannot* establish eligibility for many immigration benefits.

345. On January 1, 2026, USCIS issued Policy Memorandum PM-602-0194, directing agency personnel to extend PM-602-0192’s directives to (1) place a hold on immigration benefits and (2) review yet-to-be-adjudicated benefits requests and re-review previously approved benefits requests from the 20

additional countries listed in Presidential Proclamation 10998. U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0194, *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries* (Jan. 1, 2026).

346. Additionally, PM-602-0194 adds a new directive that agency personnel “[c]onduct a comprehensive review of all policies, procedures, and screening and vetting processes for benefit requests for aliens from countries listed in PP 10998.” *Id.*

347. It thus appears that USCIS’s “hold” on immigration benefits is four, sequential components. First, USCIS will identify which cases to “prioritize” for “review, interview, and re-interview” “[w]ithin 90 days of this memorandum issuance.” Second, USCIS will conduct a “comprehensive review of all policies, procedures, and screening and vetting processes for benefits requests for aliens from the” 39 “countries listed in PP 10998.” Third, once that review has been completed and any modifications of USCIS vetting policy are implemented, USCIS will apply updated vetting policy to the 39 countries identified in Presidential Proclamation 10998. *Id.* Finally, USCIS will review not-yet-adjudicated benefits and re-review approved benefits request from nationals of the 39 countries. *Id.*

348. It appears that the only step in this process with a defined timeframe is step one. Neither PM-602-0194 nor any other public-facing USCIS document explain when this “comprehensive review” of “all policies” will be completed. Nor can how long it will take to complete the subsequent review of cases be surmised from the publicly available materials. Indeed, USCIS notes that it may “extend this review and re-interview process to aliens who entered the United States outside of this timeframe, when appropriate.” *Id.*

VI. CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

(APA – Arbitrary, Capricious, and Unlawful Final Agency Action)

349. Plaintiffs incorporate all factual allegations above as though restated here.

350. Under the APA, courts must set aside agency action “found to be arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A).

351. An action is arbitrary and capricious if the agency “entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” *Nat’l*

Ass’n of Home Builders v. Defs. of Wildlife, 551 U.S. 644, 658 (2007) (quoting *Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983)).

352. The APA thus “sets forth the procedures by which federal agencies are accountable to the public and their actions subject to review by the courts.”

Franklin v. Massachusetts, 505 U.S. 788, 796 (1992).

353. “It requires agencies engage in ‘reasoned decision-making.’” *Dep’t of Homeland Security v. Regents of the Univ. of Cal.*, 591 U.S. 1 (2020), (quoting *Michigan v. EPA*, 576 U.S. 743, 750, (2015)).

354. Defendants’ s hold policy is arbitrary, capricious, and contrary to law.

355. As an initial matter, the hold policy is final agency action under the APA.

356. First, the action “marks the consummation of the agency's decisionmaking process,” and “second, the action” is “one by which rights or obligations have been determined, or from which legal consequences will flow.” *Bennett v. Spear*, 520 U.S. 154, 177-78, 117 S. Ct. 1154 (1997) (quotation marks and citations omitted).

357. The hold policy established a mandatory USCIS policy, rescinded prior guidance, and created a new, formal process to not adjudicate applications for all immigration benefits for noncitizens of 19, and now 39, countries. U.S. Citizenship & Immigr. Servs., Policy Memorandum PM-602-0192, *Hold and*

Review of All Pending Asylum Applications and All USCIS Benefit Applications Filed by Aliens from High-Risk Countries (Dec. 2, 2025).

<https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf> (Dec. 2, 2025); [PM-602-0194-PendingApplicationsAdditionalHighRiskCountries-20260101.pdf](https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0194-PendingApplicationsAdditionalHighRiskCountries-20260101.pdf) (Jan. 1, 2026)

358. The hold policy also satisfies the second prong of the *Bennett* test because the policy creates concrete obligations for USCIS officers.

359. The policy mandates and instructs officers on “[t]he adjudicative hold, procedural requirements, and processes for the rereview, interview, or re-interview of affected aliens.” *Id.*

360. “USCIS personnel are instructed to prioritize national security and public safety concerns and ensure compliance with all applicable laws and regulations during the adjudication process.” *Id.*

361. “All findings must be documented in accordance with established protocols to support any subsequent determinations or actions.” *Id.*

362. The hold policy therefore constitutes a final agency action subject to review under Section 704 of the APA.

363. Applicable law imposes a mandatory, nondiscretionary duty to adjudicate immigrant visa petitions and applications in accordance with statutory criteria

within a reasonable time. 8 U.S.C. § 1154(b); 8 C.F.R. 103.3(a); 5 U.S.C. § 555(b).

364. The hold policy directly bears upon the duty and obligations of USCIS and cannot escape judicial review.

365. The hold policy violates the APA because it is arbitrary and capricious. *Judulang v. Holder*, 565 U.S. 42, 45 (2011) (“When an administrative agency sets policy, it must provide a reasoned explanation for its action.”).

366. USCIS failed to articulate any reasoned explanation for adopting the hold policy because they ignored and failed to consider crucial considerations.

367. Other than referring to the government’s interest in protecting the homeland and citing to two instances where immigrants from Afghanistan had committed heinous crimes after becoming lawful permanent residents, the policy memo reveals no more about why the hold policy was created or what factors or evidence USCIS considered before deciding to select this approach for adjudicating immigration applications for individuals who already applied for benefits and could be reviewed within the rules already in place. Indeed, that the policy was released less than a week after the tragic November 26, 2025 shooting suggests that they did not.

368. There is no indication from USCIS as to whether it balanced the additional administrative burdens on United States citizens and beneficiaries who paid for

an adjudication and the strong interest that exists in family unification and pursuing lawful status against the national security benefits. *See, e.g., Motor Vehicle Mfrs. Ass’n*, 463 U.S. at 43 (“[T]he agency must examine the relevant data and articulate a satisfactory explanation for its action including a ‘rational connection between the facts found and the choice made.’”) (*quoting Burlington Truck Lines, Inc. v. United States*, 371 U.S. 156, 168, 83 S. Ct. 239 (1962)).

369. The hold policy will stall the adjudication of benefits for applicants, thereby leaving applicants in limbo within the United States.

370. There is no evidence USCIS considered whether leaving individuals in this state of abeyance increases the threat to national security versus alternative processing methodologies, such as expediting applications of those who present threats or are statutorily ineligible based on the evidence submitted or information already within the control of the government.

371. The hold policy thus appears to be at odds with the public announcement by the President, his staff, and cabinet officials that they are actively and expeditiously seeking to remove “the worst of the worst.” (cite)

372. This is a significant problem that USCIS apparently did not consider.

373. APA review “involves more than a court rubberstamping action based on bare declarations from the agency amounting to ‘trust us, we had good national

security reasons for what we did.’” *Kirwa v. U.S. Dep’t of Def.*, 285 F. Supp. 3d 257, 270 (D.D.C. 2018).

374. The alleged increased need to protect national security are compromised by USCIS’s policy to stop adjudicating applications for noncitizens already present in the U.S. based solely on where a beneficiary was born.

375. USCIS failed to rationally explain its basis for implementing the hold policy to all applicants for any immigration benefit, indicate what data, evidence, or factors the agency considered before doing so other than the two incidents that occurred in July and November 2025 by lawful permanent residents who were born in Afghanistan, and consider important aspects of the problem, including the nondiscretionary duty to complete processing of benefits which involves an individualized review of the person’s background and whether a complete stop or pause adjudications for all applicants actually increases the threat to national security.

376. The Court must set aside the arbitrary and capricious hold policy as applied to Plaintiffs.

SECOND CAUSE OF ACTION
(Administrative Procedure Act – Unreasonable Delay or Unlawful
Withholding)

377. Plaintiffs incorporate the foregoing paragraphs as though fully set forth herein.

378. The APA provides for judicial review when a person is adversely affected by agency action. 5 U.S.C. § 702. Agency action includes an agency's failure to act. 5 U.S.C. § 551(13). As the APA mandates, a court "*shall* compel agency action unlawfully withheld or unreasonably delayed." 5 U.S.C. § 706(1).

379. Defendant USCIS has a non-discretionary duty to decide Plaintiffs' pending applications and petitions, whether those be naturalization applications, adjustment of status applications, asylum applications, or other immigration benefit requests. USCIS is required to give notice of an approval or denial for all properly filed benefits requests. *See* 8 C.F.R. § 103.3(b)(19) (defining procedures for notification of approvals); 8 C.F.R. § 103.3 (defining procedures for denials). "With due regard for the convenience and necessity of the parties or their representative and within a reasonable period of time, each agency *shall proceed to conclude a matter presented to it.*" 5 U.S.C. § 555(b) (emphasis added). "[B]y using the term 'shall' in requiring that the courts compel agency action unlawfully withheld or unreasonably delayed, Congress imposes a mandatory duty in that regard." *Saini v. U.S. Citizenship & Immigr. Servs.*, 553 F. Supp. 2d 1170, 1176 (E.D. Cal. 2008).

380. Defendant USCIS' duty to adjudicate an application or petition is a discrete, ministerial act that applicants pay for in advance and that USCIS must complete within a reasonable period of time. USCIS sets appropriate fees for these

applications and petitions based on the resources it will require to make those adjudications.

381. Courts often evaluate whether an agency’s delay is unreasonable by applying the six factors identified by the D.C. Circuit in *Telecomms. Rsch. & Action Ctr. v. FCC* (“TRAC”):

(1) the time agencies take to make decisions must be governed by a ‘rule of reason’; (2) where Congress has provided a timetable or other indication of the speed with which it expects the agency to proceed in the enabling statute, that statutory scheme may supply content for this rule of reason; (3) delays that might be reasonable in the sphere of economic regulation are less tolerable when human health and welfare are at stake; (4) the court should consider the effect of expediting delayed action on agency activities of a higher or competing priority; (5) the court should also take into account the nature and extent of the interests prejudiced by delay; and (6) the court need not ‘find any impropriety lurking behind agency lassitude in order to hold that agency action is unreasonably delayed.’

Telecomms. Rsch. & Action Ctr. v. FCC, 750 F.2d 70, 80 (D.C. Cir. 1984) (citations omitted).

382. *First*, an unlawful rule of reason cannot constitute a rule of reason for TRAC factor purposes. And USCIS is prohibited from extending an entry ban under 8 U.S.C. § 1182(f) to a ban on domestic immigration benefit processing. *See SEC v. Chenery Corp.*, 318 U.S. 80, 87 (1943) (agency action may be upheld, if at all, only on lawful grounds invoked by the agency) *Refugee & Immigrant Ctr. for Educ. & Legal Servs. v. Noem*, No. 25-cv-306 (RDM), 2025 WL 1825431, at 73 (D.D.C. July 2, 2025) (rejecting the argument that 1182(f) endows the

Executive with “implied authority” over deportation proceedings and that “the President’s authority under § 1182(f) is delegable to USCIS.”).

383. *Second*, for many of these application types, Congress has, in fact, set forth statutory timetables by which the agency is meant to process these benefit requests. *See, e.g.*, 8 U.S.C. § 1447(b); 8 U.S.C. § 1158(d)(5)(A). For all others, Congress has provided that it is the sense of Congress that immigration benefit applications take no longer than 180 days. 8 U.S.C. § 1571(b). While this is not a statutory command, it does provide a measuring stick by which the Court can gauge when a delay becomes unreasonable under the APA.

384. *Third and Fifth*, USCIS’ delay in deciding Plaintiffs’ applications and petitions impacts human health and welfare, not merely economic interests. For each of the Plaintiffs, USCIS’ delays in processing their applications and petitions has resulted in them being stuck in a legal limbo, unable to create stable plans professionally or for their families as they face an uncertain future.

385. Further, many Plaintiffs will lose their immigration status in the United States in the near future due to the pause on the adjudication of their benefit application requests, which will put them at risk of being placed in deportation proceedings. Others are in the midst of critical research—often cutting edge medical research—and will have to stop these research efforts, injuring not just themselves due to a lack of employment, but all those who would benefit from

their scientific achievements. Still others have extremely young children, who are often U.S. Citizens, but are, or soon will be, unable to care for those children due to a lack of income, lack of health insurance, or other lacking support. Others are unable to care for their disabled, veteran spouses due to their inability to obtain lawful status.

386. These Plaintiffs and others similarly situated, have built lives in the United States, and all have been injured by Defendants' unreasonable delay, and outright refusal, in adjudicating their applications and petitions.

387. *Fourth*, Plaintiffs do not seek to jump the line or otherwise “speed up” the adjudication of their applications beyond those filed by similarly situated individuals. *Cf. Mashpee Wampanoag Tribal Council, Inc. v. Norton*, 336 F.3d 1094, 1100 (D.C. Cir. 2003) (in describing when the D.C. Circuit declined to find unreasonable delay due to the importance of competing priorities in assessing administrative delays, “[t]here was no evidence that the agency had treated the petitioner differently from anyone else, or that ‘officials not working on [the petitioner’s] matter . . . [were just] twiddling their thumbs.’”). Here, Plaintiffs have secured their spot in line, and they will happily wait in that line until it is time for their application or petition to be adjudicated. They simply wish for their applications to be treated the same as other applicants. The competing priorities of Defendants therefore bear little weight. The only

competing priorities that could be identified here are other identical applications, except for those who are from different countries. Rather than attempting to “leapfrog” over others in line, Defendants competing priorities are, at this time, to leapfrog others over Plaintiffs, pushing Plaintiffs into a veritable processing black hole, with no discernable time, or reason, by which they will escape and have their applications processed.

388. *Sixth*, the Court need not find any impropriety from the agency in order to determine that an unreasonable delay has occurred, and none is alleged.

389. USCIS’ failure—indeed refusal—to adjudicate Plaintiffs’ petitions and applications constitutes an unreasonable delay. Further, Defendants’ policy to re-open and re-adjudicate Plaintiffs’ already-approved benefit applications serves only to further delay Plaintiffs in taking the next steps on their immigration journeys, with any such re-adjudication necessarily coming with increased costs, emotional and financial stress, and risk of arbitrary decision making due solely to their national origin.

390. Plaintiffs have no alternative remedy available to them and are suffering irreparable harm from Defendants’ refusal to adjudicate their applications and petitions.

391. Separately, even beyond a simple delay in adjudicating Plaintiffs’ immigration benefit requests, Defendants benefits pause acts as a wholesale, and

unlawful, withholding of adjudication of Plaintiffs requests. Plaintiffs have complied with the instructions with which they have been provided in making their applications, paid hundreds of dollars per benefit request, and have patiently waited in line for those requests to be adjudicated. There is nothing in the Immigration and Nationality Act, the Administrative Procedure Act, or any other statute that would permit USCIS to unilaterally stop processing immigration benefit requests from a class of noncitizens.

392. Further, the Policy Memoranda require that Defendants conduct a wholesale re-review of not just Plaintiffs' and similarly situated individuals previously approved benefit requests, but even the policies and procedures under which those benefit requests were approved. Put differently, Defendants are several steps away from even *starting* the review of the submitted benefit requests, as the policies required for doing that review do not yet exist. While dressing their actions up as policy reviews, national security vetting, and extra scrutiny, Defendants have implemented a *de facto* ban on the adjudication of nearly all benefit requests from countries subject to a § 1182(f) entry restriction. With no benefit applications processed, or even processable under these new restrictions, Defendants have squarely taken Plaintiffs' cases from one of unreasonable delay to one of unlawful withholding.

393. Under these new policies, the Court should therefore “compel agency action unlawfully withheld or unreasonably delayed.” 5 U.S.C. § 706(1).

THIRD CAUSE OF ACTION
Ultra Vires Executive Action - Violation of 8 U.S.C. § 1152(a)(1)(A))

394. Plaintiffs incorporate the foregoing paragraphs as though fully set forth herein.

395. The INA, as enacted and amended by Congress, imposes limits on the executive’s authority to classify and exclude aliens. Section 1152(a)(1)(A) of Title 8, U.S. Code (INA § 202(a)(1)(A)), provides that, with narrowly defined exceptions, “no person shall . . . be discriminated against in the issuance of an immigrant visa because of the person’s race, sex, nationality, place of birth, or place of residence.” 8 U.S.C. § 1152(a)(1)(A).

396. This provision, a part of the Immigration Act of 1965, was a landmark reform intended to eliminate the national origin quota system and ensure that immigrant visas are issued based on neutral criteria, and not based on an applicant’s nationality or ethnicity.²⁴

²⁴ Nat’l Archives, Fifty Years Later: A Brief History of the Immigration Act of 1965 (Sept. 17, 2015), <https://www.archives.gov/publications/prologue/2015/fall/immigration-act-of-1965>

397. In the present case, certain Plaintiffs are applicants for immigrant visas in the form of adjustment of status applications—procedurally they are obtaining their immigrant visas and permanent residency at the same time by adjusting their status to an immigrant under the relevant immigrant visa classification rather than first obtaining an immigrant visa at a U.S. consulate or embassy and then entering the United States using that visa. *See* 8 U.S.C. § 1255(a).

398. The interplay between the issuance of an immigrant visa where a § 1182(f) ban is in effect—and the potential unlawful discrimination that such actions carry—is not one new to the judiciary. Indeed, in *Trump v. Hawaii*, 585 U.S. 667 (2018), this issue was discussed at length. *Id.* at 686-87 In holding that a § 1182(f) ban based on nationality alone does not run afoul of the prohibition on national origin discrimination in § 1152(a)(1)(A) in the context of entry restrictions, the Court stated:

Sections 1182(f) and 1152(a)(1)(A) thus operate in different spheres: Section 1182 defines the universe of aliens who are admissible into the United States (and therefore eligible to receive a visa). Once § 1182 sets the boundaries of admissibility into the United States, § 1152(a)(1)(A) prohibits discrimination in the allocation of immigrant visas based on nationality and other traits. The distinction between admissibility—to which § 1152(a)(1)(A) does not apply—and visa issuance—to which it does—is apparent from the text of the provision, which specifies only that its protections apply to the “issuance” of “immigrant visa[s] without mentioning admissibility or entry.

Hawaii, 585 U.S. at 686.

399. The logical corollary is that where there *is* no issue relating to entry or admissibility, § 1152(a)(1)(A)’s prohibition on national origin discrimination is in full effect. In the case of an adjustment of status applicant, a § 1182(f) ban has no bearing on their application, as they have already entered the U.S. and are therefore beyond the bounds of its restrictions. *Refugee & Immigrant Ctr. for Educ. & Legal Servs. v. Noem*, No. 25-cv-306 (RDM), 2025 WL 1825431, at 73 (D.D.C. July 2, 2025). All that remains is the typical admissibility analysis to determine whether the applicant has run afoul of any of the disqualifying criteria found in 8 U.S.C. § 1182(a)—none of which refer to a § 1182(f) entry restriction. Without admissibility being implicated, and with entry already being effectuated prior to the application, § 1152(a)(1)(A)’s prohibition on national origin discrimination is in full effect and USCIS is compelled to follow it.

400. Because the “Benefits Pause” Memorandum specifically prohibits USCIS from adjudicating immigrant visa applications made within the United States through the adjustment of status process for individuals from any of the impacted countries, it is *ultra vires*, and “otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A) or “short of statutory right” 5 U.S.C. § 706(2)(C). The Court should therefore “hold unlawful and set aside” the Benefits Pause memorandum and any implementing guidance as applied to Plaintiffs.

FOURTH CAUSE OF ACTION
(Unlawful Legislative Rule)

401. Plaintiffs incorporate the foregoing paragraphs as though fully set forth herein.

402. The APA requires legislative rules to pass through the statutorily prescribed notice-and-comment process. 5 U.S.C. § 553(a)-(c); *Warshauer v. Solis*, 577 F.3d 1330, 1337 (11th Cir. 2009).

403. First, the agency must publish a “[g]eneral notice of proposed rulemaking” in the Federal Register. 5 U.S.C. § 553(b).

404. Second, the agency must “give interested persons an opportunity to participate in the rule making through submission of written data, views, or arguments,” *id.* § 553(c), then “consider and respond to significant comments received.” *See Perez v. Mortg. Bankers Ass’n*, 575 U.S. 92, 96 (2015).

405. Last, when the final version of the rule is promulgated, the agency must include along with is “a concise general statement of [its] basis and purpose.” 5 U.S.C. § 553(c).

406. An agency may only forego notice and comment if the rule is not legislative, but instead qualifies as (1) “interpretive rules,” (2) “general statements of policy,” or (3) rules of agency organization, procedure, or practice.” *See* 5 U.S.C. § 553(b)(A).

407. Defendants’ policy memoranda and policy alerts, while purportedly impacting only the discretionary analyses, are being implemented to promote

discriminatory treatment of applicants by a beneficiary's birthplace and undermine the equal treatment of applicants as provided under the law and implementing regulations.

408. The Policy Manual now provides that a government's unreliability in issuing civil documents "directly relates to USCIS' ability to meaningfully assess **eligibility** for benefit requests." U.S. Citizenship & Immigr. Servs., Policy Manual, Vol. 1, Pt. E, Ch. 8 (Discretionary Analysis) (emphasis added).

409. A change to the adjudicatory standard for assessing eligibility requirements for applicants goes beyond discretionary criteria, and falls squarely into the definition of a legislative rule as it changes the legal rights and obligations of the applicant.

410. Because Defendants failed to engage with the rulemaking process in any way, this Court should declare this legislative rule unlawful.

411. To the extent Defendants have actually commenced the implementation and enforcement of these policies at the time judgment is entered by the Court, any such enforcement should be held to be in excess of statutory jurisdiction, authority, or limitations, or short of statutory right, and this Court should "hold unlawful and set aside" the agency actions, findings, and conclusions made pursuant to this new policy, including any denials of applications and ancillary consequences flowing from a heightened eligibility standard being imposed

upon applicants, such as loss of work authorization or determinations that an individual has failed to maintain their status. 5 U.S.C. § 706.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that this Court grant the following relief:

- 1) Take jurisdiction over this matter;
- 2) Declare that Defendants have violated the Administrative Procedure Act by unreasonably delaying and unlawfully withholding the adjudication of Plaintiffs' pending immigration benefit requests;
- 3) Declare that Policy Alert PA-2025-26, Policy Memorandum PM-602-0192, and Policy Memorandum 602-0194 are arbitrary and capricious, exceed Defendants' statutory authority, or are otherwise contrary to law or procedure;
- 4) Set aside each policy and compel Defendants to apply the adjudicatory process, standards of review, and burdens of proof, in effect prior to the enactment of these policies to Plaintiffs.
- 5) Enter an order requiring Defendants to expeditiously decide Plaintiffs' pending and future immigration benefit requests due to the arbitrary, capricious, and unlawful delay imposed due to the policies that have placed a hold on their benefit requests;

- 6) Award Plaintiffs' counsel reasonable attorneys' fees and costs under the Equal Access to Justice Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and
- 7) Enter and issue any other relief that this Court deems just and proper.

Respectfully submitted this 9th day of January, 2026,

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