

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

CRYSTAL ROBERTSON, on behalf of herself
and her minor child D.R.;

ELIZABETH DAGGETT, on behalf of herself
and her minor child H.D.;

JOANN MCCRAY, on behalf of herself and her
minor child J.C.;

VERONICA GUERRERO, on behalf of herself
and her minor child A.F.,

MARCIA CANNON-CLARK AND DAVID
CLARK, on behalf of themselves and their
minor child B.R.C; and

THE ARC OF THE UNITED STATES,

Plaintiffs,

v.

DISTRICT OF COLUMBIA,

Defendant.

Case No. 1:24-cv-00656 (PLF)

PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Crystal Robertson, on behalf of herself and her minor child D.R. and all others similarly situated; Elizabeth Daggett, on behalf of herself and her minor child H.D. and all others similarly situated; Joann McCray, on behalf of herself and her minor child J.C. and all other similarly situated; Veronica Guerrero, on behalf of herself and her minor child A.F. and all others similarly situated; Marcia Cannon-Clark and David Clark, on behalf of themselves and their minor child B.R.C and all others similarly situated; and the Arc of the United States (“Plaintiffs”) respectfully move this Court to certify a class pursuant to Federal Rules of Civil

Procedure 23(a) and 23(b)(2) and (3). In support of this motion, Plaintiffs submit a memorandum of points and authorities.

STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)

Consistent with Local Rule 7(m), Plaintiffs contacted attorneys who represent Defendant on May 2, 2024 to seek their consent to the relief requested herein. Defendant does not consent.

Dated: May 3, 2024

Respectfully submitted,

/s/ Kaitlin R. Banner

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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2024, I electronically filed the foregoing motion and the attached memorandum, exhibits, and proposed order using the Court's ECF system, which will send notice of the filing to all counsel of record via email.

Theodore E. Alexander
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