

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the  
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-LK

**JOINT PROPOSAL REGARDING  
FAIRNESS HEARING**

On March 4, 2026, the parties to this class action jointly filed an amended motion for an order directing notice of a proposed settlement. Dkt. Nos. 711, 711-1. On March 23, 2026, the Court granted that motion, preliminarily approving the parties’ proposed settlement and approving the parties’ proposed public notice to class members. Dkt. No. 713 at 11. The Court directed Plaintiffs’ counsel to “post and distribute the agreed upon ‘Public Notice to Possible Class Members of Settlement’ for a period of 60 days.” *Id.* The Court further stated that, “[w]ithin seven days of the conclusion of the notice period, the parties must notify the Court that the notice period has concluded and propose a timeline for conveying written objections to the Court and scheduling a fairness hearing.” *Id.* at 12.

The parties now write to inform the Court that the notice period has concluded. Plaintiffs’ counsel posted and distributed the agreed upon “Public Notice to Possible Class Members of Settlement” on March 25, 2026. The notice period ended on May 25, 2026.

Plaintiffs’ counsel have received no written objections to the proposed settlement. In total, Plaintiffs’ counsel received five written inquiries in response to the agreed upon public notice. All five inquiries sought information related to individual applications for immigration

1 benefits and did not contain objections to the proposed settlement. Consequently, the parties  
2 have no written objections to convey to the Court.

3 Given the lack of objections to the proposed settlement, and after conferring as to  
4 counsel's availability, the parties respectfully propose the following dates for a fairness hearing:  
5 June 11 (afternoon), June 12 (afternoon), or June 25. Defendants have a preference for June 25.  
6 Following that, Defendants' next availability is in mid-August (August 11-21).

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1 Respectfully submitted,

Dated: June 1, 2026

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