

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

ANGE SAMMA *et al.*, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
DEFENSE, *et al.*,

Defendants.

No. 20-cv-01104-PLF

**NOTICE OF FILING CORRESPONDENCE REGARDING
CONTINUED NON-COMPLIANCE**

Plaintiffs respectfully submit this Notice of Filing to notify the Court of the attached letter, dated December 9, 2021, from Plaintiffs' counsel to Defendants' counsel, describing a case of non-compliance.

Dated: December 9, 2021

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Respectfully submitted,

/s/ Sana Mayat
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December 9, 2021

DELIVERED VIA EMAIL

Liam C. Holland
Trial Attorney
U.S. Department of Justice
Washington, D.C. 20530

Re: *Samma, et al. v. United States Department of Defense, et al.*, No. 20-CV-1104 (D.D.C.)

Dear Liam,

We are writing to flag an issue with class member Yiyi Yu's N-426 certification process.

This week, Ms. Yu's counsel informed class counsel that Ms. Yu is experiencing difficulties obtaining a properly certified N-426 form. Ms. Yu first received her N-426 certification through her chain of command on June 8, 2021, three months after she first requested it. She applied for naturalization shortly thereafter. In September 2021, U.S. Citizenship and Immigration Services ("USCIS") rejected Ms. Yu's N-426 certification because Ms. Yu forgot to fill in the date next to her signature on the N-426 form. Ms. Yu requested another N-426 certification from her chain of command at her duty station at [REDACTED] and obtained it on November 22, 2021. However, the certifying officer did not complete box 4 of Section 8 of the N-426 form, which the certifying officer must complete. It has now been well over 30 days since Ms. Yu requested this second N-426 certification and she still has not obtained a properly certified N-426 form.

Class counsel request that Defendants provide Ms. Yu with a new, completed N-426 certification and have attached her N-426 form to this letter.

Class counsel further seek an update on class member Jia Ye's N-426 certification request, which class counsel brought to Defendants' attention by letter dated December 1, 2021. As stated in that letter, Mr. Ye has until December 12, 2021 to obtain a new N-426 certification for USCIS to process his naturalization application. Class counsel would therefore greatly appreciate if Defendants could assist in facilitating certification of Mr. Ye's N-426 form by that date.



Sincerely,
Sana Mayat

Counsel to Plaintiffs

Encl.

