

**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 January 11, 2022, from Plaintiffs' counsel to Defendants' counsel, describing a continuing case of non-compliance.

Dated: January 11, 2022

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Respectfully submitted,

/s/ Scarlet Kim
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January 11, 2022

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 a continuing case of non-compliance. Class counsel recently spoke with class member Alina Nair, who is currently at advanced individual training (“AIT”) at Fort Sam Houston, Texas. We first brought Ms. Nair’s situation to Defendants’ attention in a letter dated September 22, 2021. In that letter, we explained that Ms. Nair first requested her N-426 certification after completing her first drill with her Selected Reserve unit in August 2021.

On October 15, 2021, Defendants provided us with Ms. Nair’s N-426 certification. Ms. Nair applied for naturalization with United States Citizenship and Immigration Services (“USCIS”) shortly thereafter. On December 28, 2021, Ms. Nair received an email from USCIS informing her that her N-426 form was incomplete because the certifying officer did not complete blank 10 in Part 8 of the form. USCIS has stated that Ms. Nair will have to provide a new, complete N-426 certification by January 27, 2022.

Ms. Nair has requested a new, complete N-426 certification from her chain of command at AIT at Fort Sam Houston. However, her chain of command has informed her that she must serve a minimum of one year before obtaining her N-426 certification.

Class counsel request that Defendants provide Ms. Nair with a new, complete N-426 certification. Class counsel have attached Ms. Nair’s N-426 form to this letter. Ms. Nair’s current unit is [REDACTED].

Sincerely,
Scarlet Kim

Counsel for Plaintiffs

Encl.