

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSE ARNULFO GUERRERO ORELLANA,
on behalf of himself and others similarly
situated,

Petitioner-Plaintiff,

v.

ANTONE MONIZ, Superintendent, Plymouth
County Correctional Facility, et al.,

Respondents-Defendants.

Case No. 25-12664-PBS

PETITIONER-PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT

Petitioner-Plaintiff Jose Arnulfo Guerrero Orellana (“Plaintiff”) hereby moves this Court for an Order granting class-wide partial summary judgment on Count I of the First Amended Petition for Writ of Habeas Corpus and Class Action Complaint and to enter declaratory relief that class members are entitled to bond hearings upon request. Plaintiff further moves this court to enter its ruling as a partial judgment under Rule 54(b) and order notice to the class members and identification of class members to class counsel, all as further described in the enclosed proposed judgment and order.

This motion is made pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, and is based on the accompanying Memorandum of Law, Plaintiff’s Statement of Uncontroverted Facts, the accompanying declaration of Christopher E. Hart and the exhibits thereto.

Respectfully submitted,

/s/ Christopher E. Hart

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Dated: November 7, 2025

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

In accordance with Local Rule 7.1(a)(2), I, Christopher E. Hart, counsel for Petitioner-Plaintiff and the certified Class, hereby certify that, on November 7, 2025, counsel for the parties conferred via email and made a good faith effort to narrow the areas of disagreement at issue in this motion to the fullest extent. Respondents-Defendants oppose this motion.

Signed this 7th day of November, 2025.

/s/ Christopher E. Hart
Christopher E. Hart

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document will be served on counsel for all parties through the Court's CM/ECF system.

Date: November 7, 2025

/s/ Gilleun Kang
Gilleun Kang