

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

ALEXANDER GRINIS, MICHAEL
GORDON, and ANGEL SOLIZ, on
behalf of themselves and those
similarly situated,

Petitioners,

v.

STEPHEN SPAULDING, Warden of
Federal Medical Center Devens, and
MICHAEL CARVAJAL, Director of the
Federal Bureau of Prisons, in their
official capacities,

Respondents.

No. 20-cv-10738-GAO

**PETITIONERS' MOTION FOR CLASS CERTIFICATION
OR REPRESENTATIVE HABEAS ACTION**

Petitioners and the proposed Class Members, by and through their undersigned counsel, hereby respectfully move this Court for an order certifying a class pursuant to Fed. R. Civ. P. 23, or in the alternative, to certify a representative habeas class of Petitioners pursuant to *United States ex rel. Sero v. Preiser*, 506 F.2d 1115 (2d Cir. 1974). Petitioners ask this Court to certify a class consisting of all prisoners who are now or will be held by Respondents at Federal Medical Center Devens in Devens, Massachusetts. The grounds for this Motion are set forth in the accompanying Memorandum and Exhibits incorporated therein.

Respectfully submitted,

ALEXANDER GRINIS, MICHAEL GORDON, ANGEL SOLIZ,
and others similarly situated,

By their attorneys,

/s/ William W. Fick

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

I, William W. Fick, certify that on April 14, 2020, I conferred in good faith with AUSA Rayford Farquhar to discuss whether it would be possible to resolve or narrow the issues that this Motion presents.

/s/ William W. Fick

CERTIFICATE OF SERVICE

I, William Fick, certify that I have caused the foregoing document to be served by e-mail PDF upon AUSA Ray Farquhar, Civil Chief (D. Mass.), on April 15, 2020.

Because the government declined to waive formal service under Fed. R. Civ. P. 4, on that same day, I traveled in person to a U.S. Post Office to send the document to the following recipients by certified U.S. Mail:

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*/s/ William Fick*_____