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22 BENJAMIN COLLINS *et al.*

23 **UNITED STATES DISTRICT COURT**  
24 **DISTRICT OF MARYLAND**

25 BENJAMIN COLLINS, BINGBING  
26 YU, and HEALTH FREEDOM  
27 DEFENSE FUND, a Wyoming non-  
28 profit public benefit corporation,

Plaintiffs,

vs.

UR JADDOU, in his official capacity as  
Director of U.S. Citizenship and  
Immigration Services, and MANDY  
COHEN, in her official capacity as  
Director of the Centers for Disease  
Control,

Defendants.

Case No. 1:24-cv-03330-ELH

[Assigned to Hon. Ellen L. Hollander]

**PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION  
AND MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT**

[Filed concurrently with Declarations of  
Scott J. Street, Leslie Manookian, Ram  
Duriseti, Benjamin Collins and  
Bingbing Yu]

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1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiffs Benjamin Collins and Bingbing Yu  
3 will and hereby do move for an order preliminarily enjoining Defendants Ur Jaddou  
4 and Mandy Cohen from continuing to demand that green card applicants show proof  
5 of COVID-19 vaccination to obtain lawful permanent residence because Congress did  
6 not list COVID-19 as one of the diseases for which vaccination can be required and  
7 because COVID-19 is not one of the “vaccine-preventable diseases” for which the  
8 Centers for Disease Control has discretion to mandate vaccination under federal law.

9 This motion is made pursuant to Rule 65 of the Federal Rules of Civil  
10 Procedure. There is good cause to grant it. Mr. Collins is an American citizen. He  
11 intends to move back to the United States this spring. His wife, Ms. Yu, is not an  
12 American citizen. She intends to move to the U.S. with her husband and their children  
13 (American citizens) but has been unable to obtain a green card because she did not  
14 take the COVID-19 shot. That is the only reason she has been denied a green card.  
15 She satisfies all other conditions for that benefit.

16 Time is of the essence. If the Court does not act now, Plaintiffs may be forced  
17 to split up, causing irreparable harm to their young family. Meanwhile, Defendants  
18 will not suffer any harm. Neither will the public. Tourists who have not taken the  
19 COVID-19 shot are allowed to visit the country for months at a time, even multiple  
20 times per year. Moreover, reports indicate that potentially millions of unvaccinated  
21 people have entered the country illegally during the past few years, undermining any  
22 claim that Ms. Yu poses a threat to Americans’ health and safety.

23 Indeed, the CDC now admits that the COVID-19 shot does not prevent the  
24 transmission of COVID-19. There is no dispute that COVID-19 is *not* a vaccine-  
25 preventable disease. Thus, it is irrational that Defendants continue demanding that  
26 green card applicants show proof of COVID-19 vaccination, and the Court should  
27 issue a nationwide injunction to ensure that other hard-working and law-abiding

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1 people are not unjustly barred from obtaining lawful permanent residence.

2 The motion is supported by the attached memorandum of points and authorities,  
3 the concurrently filed factual declarations, any additional briefing that will be filed,  
4 and any oral argument the Court may entertain on the motion.

5 Respectfully submitted,

6  
7 DATED: January 17, 2025

JWHOWARD ATTORNEYS, LTD.  
LAW OFFICES OF WARNER  
MENDENHALL, INC.

9  
10  
11 By: /s/Warner Mendenhall

12 Warner Mendenhall  
13 Attorneys for Plaintiffs  
14 BENJAMIN COLLINS et al.  
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 This should be an easy motion to decide. Federal law dictates what a person  
4 must do to obtain lawful permanent residence (in colloquial terms, a green card). That  
5 includes showing proof of vaccination for certain diseases.

6 COVID-19 is not one of the diseases listed in the statute. It couldn't be, as it did  
7 not exist when Congress wrote the law. Congress has not amended the statute to  
8 include COVID-19, either.

9 The statute does give the government the power to require that green card  
10 applicants show proof of vaccination against any "vaccine-preventable disease" that  
11 the Centers for Disease Control recommends. But it can only do that for "vaccine  
12 preventable diseases"—that is, a disease that has been eradicated in the United States  
13 or can be eradicated through vaccination.

14 That is critical. Whatever the benefits of the COVID-19 shot (and those are  
15 being debated), the shot does not prevent infection. It does not prevent the spread of  
16 COVID-19. It will not eradicate COVID-19. That is undisputed. Even the CDC now  
17 admits it.

18 Thus, this is not a discretionary matter. Since COVID-19 is not a vaccine-  
19 preventable disease, the United States Citizenship and Immigration Services cannot  
20 require that applicants show proof of COVID-19 vaccination to obtain a green card.

21 But USCIS is still doing that. Indeed, it denied Ms. Yu's application for that  
22 reason, and that reason alone. And, unless this Court intervenes, it will continue to  
23 deny green card applicants for that reason, including in 2025, when Ms. Yu's family  
24 (her husband and children are American citizens) plans to return to the United States  
25 and she plans to re-apply for the green card.

26 The Court should not let that happen. It should enjoin Defendants from  
27 requiring that green card applicants show proof of COVID-19 vaccination.

1           **II.    FACTS**

2           **A. Defendants Add COVID-19 to the List of Required Vaccinations.**

3           In early 2020, health officials discovered a novel coronavirus that emanated  
4 from Wuhan, China. They named the disease caused by it “COVID-19.” Declaration  
5 of Scott J. Street, dated January 16, 2025 (“Street Dec.”), ¶ 3.

6           The public health response to COVID-19 was unprecedented. It included severe  
7 travel restrictions and the mass closures of businesses that health officials deemed too  
8 dangerous to operate. *Id.*, ¶ 4.

9           At the government’s urging, several experimental shots were developed to help  
10 limit the effects of COVID-19. They were developed quickly to protect those who are  
11 at highest risk of getting seriously ill from the virus, especially the elderly and those  
12 with multiple comorbidities. *Id.*, ¶ 5.

13           The companies that developed the first shots, Pfizer and Moderna,  
14 acknowledged that the shots would not prevent people from becoming infected with  
15 COVID-19. The Centers for Disease Control also eventually acknowledged that. *Id.*, ¶  
16 6.

17           Indeed, during the fall of 2021, the Department of Health and Human Services’  
18 Centers for Medicare and Medicaid Services (CMS) stated in the *Federal Register* that  
19 “the duration of vaccine effectiveness in preventing Covid-19, reducing disease  
20 severity, reducing the risk of death, and the effectiveness of the vaccine to prevent  
21 disease transmission by those vaccinated are not currently known.” 86 Fed. Reg.  
22 61,615 (Nov. 5, 2021).

23           The CMS also said that “major uncertainties remain as to the future course of  
24 the pandemic, including but not limited to vaccine effectiveness in preventing  
25 ‘breakthrough’ disease transmission from those vaccinated, [and] the long-term  
26 effectiveness of vaccination ....” *Id.*

27           Despite these statements, the CDC added COVID-19 to the list of “vaccine-  
28

1 preventable diseases” that people must show proof of vaccination against to obtain  
 2 lawful permanent residence here. Street Decl., Exh. A. It did so pursuant to 8 U.S.C. §  
 3 1182(a)(1)(A)(ii), which precludes relief to those who have “failed to present  
 4 documentation of having received vaccination against vaccine-preventable diseases,  
 5 which shall include at least the following diseases: mumps, measles, rubella, polio,  
 6 tetanus and diphtheria toxoids, pertussis, influenza type B and hepatitis B. and any  
 7 other vaccinations against vaccine-preventable diseases recommended by the [CDC’s]  
 8 Advisory Committee for Immunization Practices.”

9 COVID-19 was added to this list of “vaccine-preventable diseases” as of  
 10 October 1, 2021. Street Decl., ¶ 8, Exh. A. It is still on that list, even though, as  
 11 common experience has shown, the COVID-19 shots do not prevent a person from  
 12 becoming infected with the virus that causes COVID-19. *Id.*; *see also* Declaration of  
 13 Ram Duriseti, dated January 10, 2025 (“Duriseti Decl.”), ¶ 8.

14 The evidence of this fact is overwhelming and accepted by the medical and  
 15 public health communities. Duriseti Decl., ¶¶ 3-8. Indeed, when the newest COVID  
 16 shots were rolled out in August 2024, FDA doctor Peter Marks said: “The vaccine is  
 17 not intended to be perfect. It’s not going to absolutely prevent COVID-19. But if we  
 18 can prevent people from getting serious cases that end up in emergency rooms,  
 19 hospitals or worse — dead — that’s what we’re trying to do with these vaccines.”  
 20 Street Decl., Exh. B.

21 Thus, as of 2024, this matter is beyond debate. COVID-19 is not a vaccine-  
 22 preventable disease. Duriseti Decl., ¶ 8.

23 Despite this fact, the CDC has not withdrawn its recommendation of COVID-  
 24 19 as being a “vaccine-preventable disease” that can be required for immigration  
 25 purposes. And the USCIS continues to deny relief to people who have not taken the  
 26 COVID-19 shots, including Ms. Yu. Declaration of Bingbing Yu, dated January 15,  
 27 2025 (“Yu Decl.”), ¶¶ 4-10; *see also* Declaration of Leslie Manookian, dated January  
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1 13, 2025 (“Manookian Decl.”), ¶¶ 6-7 (discussing denials of other green card  
2 applicants who have sought help from HFDF).

3 **B. Ms. Yu’s Efforts to Obtain Lawful Permanent Residence.**

4 Ms. Yu’s husband, Mr. Collins, is an American citizen. Declaration of Brandon  
5 Collins dated January 15, 2025 (“Collins Decl.”), ¶ 2. In 2016, Ms. Yu sought and  
6 obtained a green card. Yu Decl., ¶ 3. She did that while living in Japan, where the  
7 couple met, as they intended to return to the United States to start a family.

8 In 2017, the couple’s first child was born, in Japan. Yu Decl., ¶ 4. By 2019,  
9 they were still there, and they had a second child, and planned to return to the United  
10 States.<sup>1</sup> *Id.*, ¶¶ 4-5. But the couple were told that Ms. Yu’s first green card may have  
11 expired. *Id.* So she started the process of applying for a new one.

12 By July 2023, the application was complete, and Ms. Yu just needed to appear  
13 for her medical appointment. Besides COVID-19, the only vaccination she had not  
14 taken was the hepatitis-B vaccine, which she took before the appointment. *Id.*, ¶¶ 5-6.  
15 Thus, she had proof of vaccination for all diseases required by the USCIS and the  
16 CDC except one: COVID-19. *Id.*

17 Ms. Yu was denied lawful permanent residence based on her failure to show  
18 proof of vaccination against COVID-19. *Id.*, ¶¶ 7-9. That was the only reason given  
19 for the decision. *Id.*

20 Since then, Ms. Yu has obtained a tourist visa and can come to the United  
21 States with her family without having taken the COVID-19 shot. *Id.*, ¶ 10. But she  
22 cannot stay lawfully after the tourist visa expires and she cannot obtain lawful  
23 permanent residence, which she otherwise would be entitled to, if USCIS continues  
24 demanding proof of COVID-19 vaccination to obtain that status. *Id.*

25 This has created a burden on Ms. Yu, her husband, and their family. Yu Decl.,  
26 ¶¶ 10-12; Collins Decl., ¶¶ 10-12. The family intends to return to the United States

27 \_\_\_\_\_  
28 <sup>1</sup> The children hold American citizenship through their father.



1 during the spring of 2025. Yu Decl., ¶ 11; Collins Decl., ¶ 11. Ms. Yu intends to file  
 2 another application for a green card. But, if Defendants continue requiring proof of  
 3 COVID-19 vaccination for green card applicants, it will be denied and Ms. Yu must  
 4 either leave the country after three months, breaking up the family, or stay beyond that  
 5 unlawfully, risking deportation and potential exclusion from lawful permanent  
 6 residence after that. Yu Decl., ¶ 11.

### 7 **C. Plaintiffs File this Case.**

8 Plaintiffs filed this case late last year, as they finalized their plans to return to  
 9 the United States in 2025. They did so with the support of Health Freedom Defense  
 10 Fund (“HFDF”), a non-profit that seeks to advocate for and educate the public on the  
 11 topics of medical choice, bodily autonomy, and self-determination, and which opposes  
 12 laws and regulations that force individuals to submit to the administration of medical  
 13 products, procedures, and devices against their will. Manookian Decl., ¶¶ 2-3.

14 Notably, HFDF has been contacted by numerous people, from across the United  
 15 States, who are still being denied lawful permanent residence solely because they did  
 16 not take the COVID-19 shot. *Id.*, ¶¶ 6-7.

17 Plaintiffs now seek a preliminary injunction that would prohibit Defendants  
 18 from denying Ms. Yu a green card based on her failure to take the COVID-19 shot.  
 19 Given the important public nature of this issue, and the likelihood of success on the  
 20 merits, Plaintiffs also request that the Court extend the injunction nationally,  
 21 prohibiting Defendants from denying lawful permanent residence to anybody because  
 22 they did not take the COVID-19 shot.

### 23 **III. LEGAL STANDARD**

24 To obtain a preliminary injunction, the moving party “must establish that he is  
 25 likely to succeed on the merits, that he is likely to suffer irreparable harm in the  
 26 absence of preliminary relief, that the balance of equities tips in his favor, and that an  
 27 injunction is in the public interest.” *Winter v. Natural Resources Defense Council*,



1 *Inc.*, 555 U.S. 7, 20 (2008). This includes showing that the threat of irreparable harm  
 2 is “neither remote nor speculative, but actual and imminent.” *Direx Israel, Ltd. v.*  
 3 *Breakthrough Med. Grp.*, 952 F.2d 802, 812 (4th Cir. 1991).

4 But these requirements must be applied in context. “The purpose of a  
 5 preliminary injunction is merely to preserve the relative positions of the parties until a  
 6 trial on the merits can be held.” *Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395 (1981).  
 7 In other words, a preliminary injunction is designed “to protect the status quo and to  
 8 prevent irreparable harm during the pendency of a lawsuit ultimately to preserve the  
 9 court’s ability to render a meaningful judgment on the merits.” *In re Microsoft Corp.*  
 10 *Antitrust Litig.*, 333 F.3d 517, 525 (4th Cir.2003).

#### 11 **IV. ARGUMENT**

12 The Court should grant the motion because COVID-19 is not one of the  
 13 “vaccine-preventable diseases” for which vaccination can be required under federal  
 14 law.

##### 15 **A. Defendants Can Only Require Proof of Vaccination for “Vaccine- 16 Preventable Diseases,” Which COVID-19 Is Not.**

17 The Administrative Procedures Act (“APA”) The APA provides that “[a]  
 18 person suffering legal wrong because of agency action, or adversely affected or  
 19 aggrieved by agency action within the meaning of a relevant statute, is entitled to  
 20 judicial review thereof.” 5 U.S.C. § 702.

21 The law at issue here is 8 U.S.C. § 1182, which precludes relief to green card  
 22 applicants who have not shown proof of “vaccination against [certain] vaccine-  
 23 preventable diseases ....” Some of those diseases (like polio and hepatitis B) are listed  
 24 in the statute. 8 U.S.C. § 1182(a)(1)(A)(ii). The statute also gives USCIS the power to  
 25 require “any other vaccinations against vaccine-preventable diseases recommended by  
 26 the [CDC’s] Advisory Committee for Immunization Practices ....” *Id.*

27 Ms. Yu has shown proof of vaccination against the diseases listed in the  
 28

1 statute. Yu Decl., ¶ 6. She cannot show proof of vaccination against COVID-19,  
 2 though. *Id.* The USCIS has used that failure, and that failure alone, to deny her most  
 3 recent application for lawful permanent residence. *Id.*, ¶¶ 6-9. And, unless enjoined, it  
 4 will use that failure alone to deny her next application.

5 That is not proper. The COVID-19 shot does not prevent a person from  
 6 becoming infected with the virus that causes COVID-19. Duriseti Decl., ¶ 8. That is a  
 7 fact. Even the CDC and other government agencies have acknowledged that. *See* 86  
 8 Fed. Reg. 61,615 (Nov. 5, 2021). Thus, COVID-19 is not a “vaccine-preventable  
 9 disease” and USCIS cannot deny Ms. Yu’s application for lawful permanent residence  
 10 based on their failure to show proof of vaccination against COVID-19. That exceeds  
 11 USCIS’ statutory authority.

12 This is not a discretionary matter that Plaintiffs are trying to control. And there  
 13 is no ambiguity in the statute to interpret. *See, e.g., Guedes v. Bureau of Alcohol,*  
 14 *Tobacco, Firearms, and Explosives*, 356 F. Supp. 3d 109, 129 (D.D.C. 2019)  
 15 (upholding ATF’s interpretation that bump stock is a machinegun as defined under  
 16 federal law).<sup>2</sup> Section 1182 defines the “vaccine-preventable diseases” for which  
 17 proof of vaccination is required to obtain relief. The statute then delegates discretion  
 18 to the CDC to recommend “any other vaccinations for vaccine-preventable diseases”  
 19 to add to the list but that discretion cannot be exercised except for a “vaccine-  
 20 preventable” disease. 8 U.S.C. § 1182(a)(1)(A)(ii). Since COVID-19 is not a vaccine-  
 21 preventable disease, the CDC does not have the discretion to add it to the list of  
 22 required immunizations and USCIS does not have the statutory authority to rely on  
 23 lack of COVID vaccination to deny lawful permanent residence to those like Ms. Yu  
 24 who otherwise qualify for it.

25 \_\_\_\_\_  
 26 <sup>2</sup> Of course, even if the statutory language were ambiguous, Defendants’ interpretation of it is no  
 27 longer entitled to *Chevron* deference, as “*Chevron* is overruled. Courts must exercise their  
 28 independent judgment in deciding whether an agency has acted within its statutory authority, as the  
 APA requires.” *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244, 2273 (2024).

1 Thus, Plaintiffs are likely to succeed on their claim that Defendants do not have  
 2 the statutory authority to require that applicants show proof of COVID-19 vaccination  
 3 to obtain a green card. *See, e.g., Solid Waste Agency of N. Cook Cnty. v. U.S. Army*  
 4 *Corps of Eng'rs*, 531 U.S. 159, 174 (2001) (ruling for plaintiffs because government  
 5 exceeded its statutory authority in taking challenged action).

6 **B. Plaintiffs Will Suffer Irreparable Harm Without This Relief.**

7 Plaintiffs will also suffer irreparable harm if the Court does not grant this relief.

8 The Fourth Circuit has recognized that “irreparable harm occurs when the  
 9 threatened injury impairs the court’s ability to grant an effective remedy.” *Int’l*  
 10 *Refugee Assistance Project v. Trump*, 883 F.3d 233, 270 (4th Cir.), as amended (Feb.  
 11 28, 2018), cert. granted and judgment vacated on other grounds, 585 U.S. 1028 (2018)  
 12 (“*IRAP*”). It has also recognized that people “whose family members are categorically  
 13 rendered ineligible for visas have demonstrated a likelihood of irreparable harm.” *Id.*  
 14 Indeed, federal courts across America have found that the potential separation of  
 15 parents and children due to immigration policies creates irreparable harm sufficient to  
 16 grant preliminary injunctive relief. *See M.G.U. v. Nielsen*, 325 F. Supp. 3d 111, 122-  
 17 23 (D.D.C. 2018) (recognizing this); *Washington v. Trump*, 847 F.3d 1151, 1169 (9th  
 18 Cir. 2017) (noting that separation of families is a “substantial injur[y] and even  
 19 irreparable harm[ ]”).

20 This case qualifies. Ms. Yu’s husband and children are American citizens. Yu  
 21 Decl., ¶¶ 2-4; Collins Decl., ¶¶ 2-4. Thus, they can remain in the United States long-  
 22 term. But Ms. Yu cannot. She will be deprived of lawful permanent residence and will  
 23 either have to leave America after a few months or overstay her visa and risk the legal  
 24 consequences of that. Yu Decl., ¶¶ 10-12; Collins Decl., ¶¶ 10-12. That constitutes  
 25 irreparable harm under federal law. *See Monster Energy Co. v. Baran*, No.  
 26 EDCV19871JGBKKX, 2020 WL 1652548, at \*3-4 (C.D. Cal. Mar. 26, 2020) (noting  
 27 that “[a]ccrual of ‘unlawful presence’ has serious consequences” such that plaintiff’s  
 28

1 “irrecoverable lost wages combined with the accrual of unlawful presence constitute  
2 irreparable damage” sufficient to support preliminary injunction).

3 **C. The Balance of Harms Favors Plaintiffs Serves the Public Interest.**

4 The balance of harms also favors Plaintiffs. In weighing the equities, the Court  
5 “must balance the competing claims of injury and must consider the effect on each  
6 party of the granting or withholding of the requested relief.” *Winter*, 555 U.S. at 24  
7 (citation omitted). It must also consider the public interest. But, when the government  
8 is the defendant, the balancing of the equities and the public interest factors merge.  
9 *League of Wilderness Defs./Blue Mountains Biodiversity Project v. Connaughton*, 752  
10 F.3d 755, 766 (9th Cir. 2014).

11 That principle is dispositive. “There is generally no public interest in the  
12 perpetuation of unlawful agency action.” *League of Women Voters of United States v.*  
13 *Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016) (“*LWV*”). In fact, the public interest demands  
14 that “governmental agencies abide by the federal laws that govern their existence and  
15 operations.” *Washington v. Reno*, 35 F.3d 1093, 1103 (6th Cir. 1994). Thus, Plaintiffs’  
16 “extremely high likelihood of success on the merits is a strong indicator that a  
17 preliminary injunction would serve the public interest.” *LWV*, 838 F.3d at 12; *see also*  
18 *Coyotl v. Kelly*, 261 F. Supp. 3d 1328, 1344 (N.D. Ga. 2017) (“[T]he public has an  
19 interest in government agencies being required to comply with their own written  
20 guidelines instead of engaging in arbitrary decision making.”).

21 Defendants cannot show otherwise. They may speculate about the harm that  
22 would flow from having an unvaccinated person like Ms. Yu in the United States,  
23 contrary to the CDC’s recommendation. But there is no prohibition on Ms. Yu  
24 entering the United States. She can enter, and has entered, the United States on a  
25 tourist visa. Yu Decl., ¶ 10. Millions of other people have entered the United States  
26 without showing proof of COVID-19 vaccination. Thus, Ms. Yu’s presence in  
27 America does not pose a threat to anybody. And an injunction that prevents

1 Defendants from denying her green card application for failing to show proof of  
2 COVID-19 vaccination does not pose a threat to anybody either.

3 **D. A Nationwide Injunction is Warranted.**

4 The Court should not delay. Ms. Yu and her family intend to travel back to the  
5 United States this spring and to re-apply for a green card as soon as possible. Yu  
6 Decl., ¶¶ 11-12; Collins Decl., ¶¶ 11-12. Granting relief now will ensure that her  
7 application is considered fairly, without the unlawful COVID-19 vaccination  
8 requirement.

9 The Court should also extend the injunction nationwide, to prohibit Defendants  
10 from requiring proof of COVID-19 vaccination for any green card applicants. We  
11 recognize that this is an extraordinary request. But the Fourth Circuit upheld the  
12 issuance of a nationwide injunction in the immigration context in *IRAP*. And while the  
13 Supreme Court partially stayed that injunction, it upheld it “with respect to parties  
14 similarly situated to [the plaintiffs].” *Trump v. Int’l Refugee Assistance Project*, 582  
15 U.S. 571, 582 (2017).

16 That is the case here. USCIS has denied hundreds, if not thousands, of green  
17 card applications due solely to the applicant’s failure to show proof of COVID-19  
18 vaccination. Manookian Decl., ¶ 7. It is still denying them for that reason. *Id.*

19 Those people should not be forced to file individual lawsuits. The law is clear.  
20 Since COVID-19 is not a vaccine-preventable disease, Defendants do not have the  
21 statutory authority to require that green card applicants show proof of it to obtain  
22 lawful permanent residence.

23 **V. CONCLUSION**

24 For the foregoing reasons, the Court should grant the motion and preliminarily  
25 enjoin Defendants from continuing to require that green card applicants like Ms. Yu  
26 show proof of COVID-19 vaccination to obtain lawful permanent residence.

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Respectfully submitted,

DATED: January 17, 2025

JWHOWARD ATTORNEYS, LTD.  
and the MENDENHALL LAW GROUP

By: /s/Warner Mendenhall

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Attorneys for Plaintiffs  
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**CERTIFICATE OF SERVICE**

A copy of the foregoing has been sent by the Court’s Electronic Filing System to all parties of record on 1-17-2025.

/s/Warner Mendenhall  
Warner Mendenhall  
(Ohio Bar No. 0070165)  
(District of Maryland Bar No. 30433)

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