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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

RANJITHA SUBRAMANYA, individually	:
and on behalf of a class of those similarly	:
situated,	:
725 Mill Crossing Dr.	:
Westerville, Ohio 43082	: Case No
Plaintiff,	· :
	: Judge
v.	:
UNITED STATES CITIZENSHIP AND	: VERIFIED COMPLAINT FOR
IMMIGRATION SERVICES	: TEMPORARY RESTRAINING
20 Massachusetts Ave., NW	: ORDER, PRELIMINARY AND
Washington, D.C. 20001	: PERMANENT INJUNCTIVE
	: RELIEF, DECLARATORY
and	: RELIEF AND WRIT OF
	: MANDAMUS
KEN CUCCINELLI, in his official capacity	:
as the Acting Director of U.S. Citizenship	:
and Immigration Services	:
20 Massachusetts Ave., NW	:
Washington, D.C. 20001	:
	:
and	:
	:
ERNEST DESTEFANO, in his official	:
capacity as the Chief of the Office of Intake	:
and Document Production, USCIS	:
20 Massachusetts Ave., NW	
Washington, D.C. 20001	:
	:
Defendants.	:

1. This putative class action Complaint seeks temporary, preliminary and permanent mandatory injunctive relief, declaratory relief, and a writ of mandamus to compel Defendants to perform their clear legal duty to issue Employment Authorization Documents ("EADs") to Plaintiff and class members after approving their Applications for Employment Authorization.

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Because USCIS has significantly slowed and/or stopped printing EADs, which are essential for Plaintiff and approximately 75,000 putative class members to obtain or keep their jobs, Plaintiff seeks emergency relief that requires Defendants to print and issue the EADs immediately, and in no event later than seven days from the date of the Court's order.

2. Below are images of an exemplar EAD that is available on USCIS's website:<sup>1</sup>



3. Section 274a.13(b) of Title 8 of the Code of Federal Regulations imposes a clear and non-discretionary legal duty on Defendant United States Citizenship and Immigration Services (USCIS) to issue an EAD to every successful applicant for employment authorization: "If the application is granted, the alien *shall be* notified of the decision and *issued an employment authorization document* valid for a specific period and subject to any terms and conditions as noted." 8 C.F.R. § 274a.13(b) (emphasis added).

4. It is necessary for USCIS to issue EADs because its mere approval of Applications for Employment Authorization is legally insufficient to confer permission to work on Plaintiff and class members. Instead, aliens must provide employers with a valid and unexpired EAD issued by Defendants before they can be lawfully hired or allowed to continue their employment.

<sup>&</sup>lt;sup>1</sup> These images were downloaded from the following URL on July 21, 2020: <u>https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents</u>

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5. Historically, Defendants have printed and issued EADs promptly after approving an alien's Application for Employment Authorization, typically within 48 hours after approval.

6. Recently, however, Defendants have significantly slowed and/or stopped issuing EADs, thereby causing irreparable injury to Plaintiff and class members.

7. For example, USCIS approved Plaintiff's application to extend her H-4 status and employment authorization on April 7, 2020, but Defendants unlawfully failed to issue her an EAD after approving her application. As a result, Plaintiff was forced to stop working for her employer after her initial EAD expired on June 7, 2020. To date, she still has not received her EAD and she remains unable to work. Worse, her employer has notified her that she will lose her job if she does not provide proof of employment authorization by August 9, 2020.

8. Defendants reportedly have not provided Plaintiff and class members the EADs to which they are legally entitled because they terminated USCIS's printing contract with a third party, without having any intention or plan to replace that printing contract with another contract or method that would allow Defendants to print and issue EADs in a timely manner.

9. Defendants' deliberate and intentional decision to significantly slow or stop providing EADs to aliens after approving their Applications for Employment Authorization is arbitrary, capricious and in violation of the laws and Constitution of the United States.

10. This Court is authorized by the Administrative Procedure Act, 5 U.S.C. § 551 et seq. and the Mandamus Act, 28 U.S.C. § 1361, to issue an order compelling Defendants to issue EADs to Plaintiff and class members.

11. By delaying or refusing to provide EADs to Plaintiffs and class members, Defendants have abused their power in an egregious and outrageous manner, without any reasonable justification in the service of a legitimate governmental objective, and with either an

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intention to harm Plaintiff and class members or deliberate indifference. Defendants have thereby violated the guarantee of substantive due process inherent in the Due Process Clause of the Fifth Amendment to the United States Constitution.

12. Defendants' actions and failures to act have intentionally, deliberately and/or willfully inflicted irreparable harm on Plaintiff and class members, who are unable to work despite having been granted employment authorization, solely because of the lack of an EAD.

13. Under the foregoing laws and the Constitution of the United States, this Court should issue a mandatory temporary restraining order, writ of mandamus, preliminary and permanent injunctive relief, and declaratory relief that compels Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven calendar days after the date of the Court's order.

### **PARTIES**

14. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

15. Plaintiff Ranjitha Subramanya is a native and citizen of India. Plaintiff was admitted to the United States as an H-1B nonimmigrant to work at Nationwide Insurance. Plaintiff applied for, and was granted a change of nonimmigrant status to H-4, a nonimmigrant dependent of Vinod Simha, her husband. Plaintiff's husband is an employee of American Electric Power and the recipient of a lawfully-extended H-1B nonimmigrant petition. Both Plaintiff's husband and Plaintiff are in valid H-1B and H-4 status, respectively. Their status is valid until June 7, 2023.

16. Defendant United States Citizenship and Immigration Services is charged with the statutory duty to adjudicate benefits pursuant to the Immigration and Nationality Act, 8 U.S.C. §1101 et. seq. This duty includes the clear and non-discretionary legal obligation to issue an

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Employment Authorization Document (EAD) following approval of an Application for Employment Authorization. 8 C.F.R. § 274a.13(b).

17. Defendant Ken Cuccinelli is the Acting Director for the United States Citizenship and Immigration Services and this action is brought against him in his official capacity. Defendant Cuccinelli is generally charged with the duty to oversee the operations of USCIS and is responsible for ensuring that USCIS fairly and reasonably adjudicates applications for benefits pursuant to the Immigration and Nationality Act. He is also responsible for ensuring that USCIS complies with all of its legal obligations, including its clear and non-discretionary duty to issue EADs after it approves Applications for Employment Authorization. 8 C.F.R. § 274a.13(b).

18. Ernest DeStefano, is the Chief of the Office of Intake and Document Production of USCIS, and has supervisory authority over the ministerial operations to produce and mail secure identity documents, such as Permanent Resident Cards and Employment Authorization Documents. This action is brought against him in his official capacity.

#### **JURISDICTION**

19. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

20. This Court has subject-matter jurisdiction of this action under 5 U.S.C. § 702 and 28 U.S.C. §§ 1331, 1361, and 1651.

#### **VENUE**

21. Venue is proper in this district and division under 28 U.S.C. § 1391(e)(1).

## FACTUAL BACKGROUND

22. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

23. Plaintiff timely applied for an extension of her H-4 nonimmigrant status and an extension of her employment authorization on December 23, 2019. True and accurate copies of the receipts for these applications are attached to this Complaint as Exhibit A.

24. Plaintiff received notice of an Application Support Center appointment on January 17, 2020 and appeared for this appointment to permit the USCIS to capture her biometric identifiers. A true and accurate copy of the Notice of Appointment is attached to this Complaint as Exhibit B.

25. Plaintiff's applications to extend nonimmigrant H-4 status and Employment Authorization were approved by USCIS on April 7, 2020. The approval notices, true and accurate copies of which are attached to the Complaint as Exhibit C, extended Plaintiff's H-4 status and work authorization until June 7, 2023. However, Defendants have failed and refused to issue the physical card, which is the only document sufficient to provide evidence of employment authorization to an employer.

26. Generally, the EAD is produced and sent to the applicant within 48 hours of the approval. It has been over 105 days since USCIS approved Plaintiff's application and Defendant still has not printed and sent the EAD to Plaintiff.

27. On May 4, 2020, Plaintiff, through counsel, filed an inquiry regarding the nondelivery of the EAD through Defendants' E-Request, an on-line inquiry system. The inquiry was assigned ID number SR11252000620NSC, and the automated response to counsel stated that a response would be issued by May 26, 2020.

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28. The promised response time, before May 26, 2020, was very close to the expiration of Plaintiff's existing EAD on June 7, 2020. Plaintiff therefore called the USCIS Contact Center on May 14, 2020 to make a further inquiry and was told by the USCIS officer that she would receive the EAD before the end of May.

29. In the meantime, USCIS processed the inquiry from counsel submitted on May 4, 2020. On May 18, 2020, the inquiry was assigned to an officer and a response was forwarded to counsel. That response, a true and accurate copy of which is attached to the Complaint as Exhibit D, states that the matter was under review, and a minimum of 60 days was required for this review.

30. This unsatisfactory answer prompted Plaintiff to again contact USCIS on May 20, 2020. Plaintiff was told that the inquiry was recorded on May 18, 2020, and the application was being reviewed. Plaintiff was not informed of the expected delivery date of her EAD.

31. On May 28, 2020, Plaintiff again contacted USCIS to check the status of her EAD. Plaintiff was told that applicants are expected to allow a minimum of 60 days from the date USCIS responded to an inquiry to process/review the request. Plaintiff was told that agents are unable to escalate an inquiry until the 60 days has lapsed. Defendants, through their respective agents, have never provided any explanation for the delay in the creation of this EAD.

32. On June 1, 2020, Plaintiff's counsel inquired of Senator Rob Portman's office about the status of Plaintiff's EAD.

33. On June 2, 2020, Senator Portman advised Plaintiff through her counsel that "[u]nfortunately, according to [USCIS] officials, while your I-765 was approved on April 7, 2020, there are significant delays at this time in card production. USCIS is unable to expedite the production of EAD cards."

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34. Plaintiff's existing EAD expired on June 7, 2020 and she became unable to provide the required evidence of her employment authorization, notwithstanding USCIS's approval of her application for employment authorization on April 7, 2020.

35. Plaintiff's employer has advised her that it will terminate her employment on August 9, 2020, if she has not produced valid proof of employment authorization by that time.

36. On June 10, 2020, Senator Rob Portman's office submitted a follow-up inquiry on Plaintiff's behalf to USCIS. On July 21, 2020, Senator Portman advised Plaintiff through her counsel that "[u]nfortunately, according to [USCIS] officials, they are far behind in card production. We are aware that your I-765 was approved on April 7, 2020, however, USCIS says that they are unable to expedite the printing of your card."

37. On June 12, 2020, Plaintiff again contacted USCIS to check the status of her EAD. Plaintiff once again was told that applicants are expected to allow a minimum of 60 days from the date USCIS responded to an inquiry to process/review the request. Plaintiff was again told that agents are unable to escalate an inquiry until the 60-day period has lapsed.

38. Despite Plaintiff's timely application for extension of employment authorization benefits and subsequent USCIS approval and extensive efforts to implore USCIS to issue the EAD, Plaintiff has not received either an explanation of why the EAD has not been issued or when she might expect it to be issued. Without a valid EAD, Plaintiff is unable to provide satisfactory evidence of her employment authorization to meet the I-9 requirements as set forth in 8 U.S.C. §1324a(b)(1)(C), and is in imminent jeopardy of losing her job.

39. Plaintiff has not had access to gainful employment since June 7, 2020, when her employment authorization expired. If Plaintiff's EAD is promptly issued by order of this Court and received prior to August 9, 2020, Plaintiff will be eligible to return to work at her place of

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previous employment as an H-4 nonimmigrant with employment authorization. If not, then Plaintiff will be irreparably harmed by the permanent loss of her employment.

## **CLASS ALLEGATIONS**

40. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

41. Pursuant to Rules 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure, Plaintiff brings this action on behalf of herself and the following nationwide class:

All aliens who reside in the United States and have submitted an Application for Employment Authorization that has been approved by USCIS, but who have not received an EAD.

42. The proposed class is so numerous that joinder of all of its members is impracticable. On information and belief, USCIS reportedly has a backlog of at least 75,000 unprinted EADs.

43. There are numerous questions of law and fact that are common to the individual Plaintiff and class members, including:

- a. Whether Defendants have significantly slowed and/or stopped issuing EADs after approving Applications for Employment Authorization;
- b. Whether Defendants failed to issue EADs to Plaintiff and class members because they terminated USCIS's printing contract with a third party, without having any intention or plan to replace that printing contract with another contract or method that would allow Defendants to print and issue EADs in a timely manner;
- c. Whether Defendants' actions and failures to act have caused irreparable injury to Plaintiff and class members;

- d. Whether Defendants' failure to issue EADs to Plaintiff and class members violates 8 C.F.R. § 274a.13(b);
- e. Whether Defendants' failure to issue EADs to Plaintiff and class members violates 5 U.S.C. § 555(b);
- f. Whether Defendants' failure to issue EADs to Plaintiff and class members constitutes final agency action;
- g. Whether Defendants failed to take a discrete agency action that they are required to take;
- Whether Defendants' failure to issue EADs to Plaintiff and class members is arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law;
- Whether Defendants' failure to issue EADs to Plaintiff and class members is contrary to a constitutional right, power, privilege, or immunity, including the substantive due process guarantee inherent in the Due Process Clause of the Fifth Amendment to the United States Constitution;
- j. Whether Defendants have abused their power in an egregious and outrageous manner, without any reasonable justification in the service of a legitimate governmental objective, and with either an intention to harm Plaintiff and class members or deliberate indifference;
- Whether Defendants' failure to issue EADs to Plaintiff and class members is in excess of statutory jurisdiction, authority, or limitations, or short of statutory right;

- m. Whether this Court should compel Defendants to issue EADs, which action has been unlawfully withheld and/or unreasonably delayed;
- n. Whether this Court should hold that Defendants acted unlawfully when they failed to issue EADs to Plaintiff and class members;
- o. Whether Plaintiff and class members have a clear right to relief;
- p. Whether Defendants have a clear, non-discretionary, mandatory and ministerial legal duty to issue EADs to Plaintiff and class members;
- q. Whether no other adequate remedy is available to Plaintiff and class members; and
- r. Whether this Court should issue a mandatory temporary restraining order, emergency writ of mandamus, preliminary and permanent injunctive relief, and/or declaratory relief requiring Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the Court's order.
- 44. Plaintiff's claims are typical of the claims asserted by the entire class.

45. Plaintiff will fairly and adequately protect the interests of the class. There is no actual or potential conflict between members of the class with respect to the relief sought in this lawsuit. Moreover, Plaintiff is represented by a law firm and attorneys who are well-experienced with class actions.

46. Defendants are acting or refusing to act on grounds generally applicable to the class, making appropriate temporary, mandamus, injunctive and corresponding declaratory relief with respect to the class as a whole.

## <u>COUNT ONE</u> (Administrative Procedure Act, 5 U.S.C. § 706(1))

47. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

48. Pursuant to the Administrative Procedure Act, 5 U.S.C. § 706(1), this Court shall compel agency action that has been unlawfully withheld or unreasonably delayed.

49. Defendants are required to issue EADs to Plaintiff and class members after approving their Applications for Employment Authorization.

50. Until recently, Defendants issued EADs promptly after approving an alien's Application for Employment Authorization, typically within 48 hours after that approval.

51. Recently, however, Defendants significantly slowed and/or stopped issuing EADs after approving Applications for Employment Authorization, thereby causing irreparable injury to Plaintiff and class members.

52. For example, USCIS approved Plaintiff's application to extend her H-4 status and employment authorization on April 7, 2020, but Defendants did not issue her an EAD. As a result, Plaintiff was forced to stop working for her employer after her initial EAD expired on June 7, 2020. To date, she still has not received her EAD, she remains unable to work, and her employment will be terminated if she does not provide a valid EAD by August 9, 2020.

53. Defendants reportedly have not provided Plaintiff and class members the EADs to which they are legally entitled because they terminated USCIS's printing contract with a third party, without having any intention or plan to replace that printing contract with another contract or method that would allow Defendants to print and issue EADs in a timely manner.

54. Defendants have failed to take a discrete and non-discretionary agency action that they are required to take.

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55. Defendants' failure to act constitutes final agency action because USCIS has concluded its decision-making process and its approval of Applications for Employment Authorization have determined the rights and obligations of Plaintiff and class members.

56. Plaintiff and class members have no other adequate remedy in court to redress Defendants' refusal to issue and/or unreasonable delay in issuing their EADs.

57. Defendants' failure to issue EADs has caused and will imminently cause substantial and concrete harm to Plaintiff and class members, who have lost or will lose the ability to work as a result of Defendants' unlawful actions and/or failure to act.

58. Plaintiff seeks, on behalf of herself and the class, a mandatory temporary restraining order and preliminary and permanent injunctive relief that requires Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the date of the Court's order.

59. Plaintiff further seeks a declaration that Defendants have violated their obligations to comply with 8 C.F.R. § 274a.13(b).

60. Plaintiff further seeks an award of reasonable attorneys' fees and costs.

## <u>COUNT TWO</u> (Writ of Mandamus, 28 U.S.C. § 1361)

61. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

62. Pursuant to 28 U.S.C. § 1361, this Court has original jurisdiction of this action in the nature of mandamus to compel Defendants, who are an agency, officers or employees of the United States, to perform a duty owed to Plaintiff and class members.

63. Plaintiff has a clear legal right under 8 C.F.R. § 274a.13(b) to be issued an EAD valid for the period specified on Plaintiff's I-797 after approval of the Application for Employment

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Authorization has been granted. The regulation provides in relevant part: "If the application is granted, the alien shall be notified of the decision and issued an employment authorization document valid for a specific period..."

64. Class members have a clear legal right under 8 C.F.R. § 274a.13(b) to be issued an EAD valid for the applicable or specified period after approval of their Applications for Employment Authorization have been granted.

65. Defendants have a clear legal duty to conclude matters within a reasonable time under 5 U.S.C. § 555(b), which provides in relevant part: "With due regard for the convenience and necessity of the parties or their representatives and within a reasonable time, each agency shall proceed to conclude a matter presented to it."

66. Defendants have a clear legal duty to complete proceedings within a reasonable time under 5 USC § 558(c), which provides in relevant part: "The agency, with due regard for the rights and privileges of all the interested parties and adversely affected persons and within a reasonable time, shall set and complete proceedings required to be conducted in accordance with sections 556 and 557 of this title or other proceedings required by law..." 5 U.S.C. § 558(c).

67. Plaintiff and class members have no other adequate remedy to redress Defendants' refusal and/or unreasonable delay in issuing their EADs.

68. Defendants' failure to issue EADs have caused and will imminently cause substantial and concrete harm to Plaintiff and class members, who have lost or will lose the ability to work as a result of Defendants' unlawful actions and/or failure to act.

69. Plaintiff seeks, on behalf of herself and the class, a writ of mandamus that requires Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the date of the Court's order.

70. Plaintiff further seeks an award of reasonable attorneys' fees and costs.

## **COUNT THREE**

## (Administrative Procedure Act, 5 U.S.C. § 706(2) and the Due Process Clause of the Fifth Amendment to the United States Constitution (Substantive Due Process))

71. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

72. Pursuant to the Administrative Procedure Act, 5 U.S.C. § 706(2), this Court shall hold unlawful and set aside agency action, findings, and conclusions found to be (A) arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; (B) contrary to constitutional right, power, privilege, or immunity; or (C) in excess of statutory jurisdiction, authority, or limitations, or short of statutory right.

73. The Due Process Clause of the Fifth Amendment to the United States Constitution provides: "No person shall be ... deprived of life, liberty, or property, without due process of law." This Clause has been interpreted to include a right to substantive due process.

74. Plaintiff and class members have a liberty interest in the right to lawful employment.

75. Once their Applications for Employment Authorization have been approved by Defendants, Plaintiff and class members have a property interest in their EADs.

76. Defendants reportedly have not provided Plaintiff and class members the EADs to which they are legally entitled because they terminated USCIS's printing contract with a third party, without having any intention or plan to replace that printing contract with another contract or method that would allow Defendants to print and issue EADs in a timely manner.

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77. Defendants' actions and failures to act have intentionally, deliberately and/or willfully inflicted irreparable harm on Plaintiff and class members, who are unable to work despite having been granted employment authorization, solely because of the lack of an EAD.

78. Defendants' deliberate, willful and unlawful refusal to print and issue EADs has deprived Plaintiff and class members of their liberty interest in the right to lawful employment and their property interest in their EADs.

79. Defendants' deliberate, willful and unlawful refusal to print and issue EADs to Plaintiff and class members, thereby depriving them of rights protected by the Fifth Amendment to the United States Constitution, constitutes an egregious and outrageous abuse of governmental power that shocks the conscience.

80. Defendants' deliberate, willful and unlawful refusal to print and issue EADs is without any reasonable justification in the service of a legitimate governmental objective.

81. Defendants' deliberate, willful and unlawful refusal to print and issue EADs is either motivated by an intention to harm Plaintiff and class members or constitutes deliberate indifference.

82. Defendants' failure to issue EADs has caused and will imminently cause substantial and concrete harm to Plaintiff and class members, who have lost or will lose the ability to work as a result of Defendants' unlawful actions and/or failure to act.

83. Plaintiff seeks, on behalf of herself and the class, a mandatory temporary restraining order and preliminary and permanent injunctive relief that requires Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the date of the Court's order.

84. Plaintiff further seeks a declaration that Defendants have violated the guarantee of substantive due process inherent in the Due Process Clause of the Fifth Amendment to the United States Constitution.

85. Plaintiff further seeks an award of reasonable attorneys' fees and costs.

## **IRREPARABLE HARM / INADEQUATE REMEDY AT LAW**

86. Plaintiff incorporates the allegations in the foregoing paragraphs as if they were fully restated herein.

87. Defendants' refusal and/or failure to issue EADs to Plaintiff and class members have deprived and will deprive them of lawful employment and the benefits thereof, including but not limited to wages, income, health insurance, other benefits, and the ability to provide financial support for themselves and their families.

88. Plaintiff and class members have been and will be irreparably harmed because they cannot sue Defendants for monetary damages that would make them whole for lost employment opportunities and benefits.

89. Plaintiff and class members cannot be adequately compensated for these harms in an action at law for money damages.

WHEREFORE, Plaintiff respectfully prays as follows:

 a) The Court enter a mandatory temporary restraining order that requires Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the date of the Court's order;

- b) The Court issue a writ of mandamus that compels Defendants to issue EADs to Plaintiff and class members immediately, and in no event later than seven days after the date of the Court's order;
- c) The Court enter preliminary and permanent injunctions that require Defendants to issue EADs promptly after approving Applications for Employment Authorization, and in no event later than seven days after the date of such approval;
- d) The Court issue a declaration that Defendants have violated their obligations under 8 C.F.R. § 274a.13(b) and the Due Process Clause of the Fifth Amendment to the United States Constitution;
- e) Plaintiff and class members recover their reasonable attorneys' fees and costs; and
- f) Plaintiff and class members have such other and further relief that the Court deems just and equitable.

Respectfully submitted,

<u>s/ Robert H. Cohen</u>
Robert H. Cohen, Trial Attorney (0009216)
Caroline H. Gentry (0066138)
David P. Shouvlin (0066154)
Porter Wright Morris & Arthur LLP
41 South High Street, Suites 2800-3200
Columbus, OH 43215
Telephone: 614.227.2066
Email: <u>rcohen@porterwright.com</u>

Counsel for the Plaintiff

## VERIFICATION

I, Ranjitha Subramanya, declare under penalty of perjury under the laws of the United States that upon my personal knowledge and review of documents, the allegations of fact contained in the foregoing Verified Complaint are true and correct to the best of my knowledge and belief.

Executed this <u>21</u><sup>st</sup> day of July, 2020.

Ranjitha Subramanya

Exhibit	Description of Exhibit
A	Form I-797C, Notice of Action: Receipts for Form I-539, Application to Extend Nonimmigrant Status and Form I-765, Application for Employment Authorization
В	Form I-797C, Notice of Action: Appointment Notice for Biometrics
С	Form I-797C, Notice of Action: Approval of Applications to Extend H-4 nonimmigrant status and Employment Authorization (April 7, 2020 and July 7, 2020)
D	Correspondence from USCIS in response to Counsel's inquiry regarding non- issuance of EAD, May 18, 2020 and July 8, 2020

## LIST OF ATTACHMENTS

Department of Homeland Security U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

## THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

Device bits         Application           1222/2019         Page         Building           Notice bate         Page         Building           1222/2019         1 of 1         SUBRAMANYA, RANITHA           RANITTHA SUBRAMANYA         SUBRAMANYA, RANITHA           RANITTHA SUBRAMANYA         SUBRAMANYA, RANITHA           OCATHERNEE C KANG         Notice Type: Receipt Notice           A 1 SOUTH HIGH STREET FLR 31         COLUMBUS OH 43215           This nelice confirms that USCIS received your application or petition ("this case") as shown above.         If any of the information in your case on the any ange stations about; your case, you can connect with the USCIS Centaal Center 1           This nelice confirms that USCIS received your application or petition ("this case") as shown above.         Provemant is a shown above.           This nelice confirms that USCIS received your application or petition ("this case") as shown above.         Provemant is an order to shown above.           You can receive quadrate shown above.         Provemant is an order to shown above.         Provemant is an order to shown above.           You can receive quadrate shown above.         Provemant is an order to shown above.         Provemant is an order to shown above.           You can receive an infinit document as order the receive annihit and cancer and provemant of the data shown.         Provesting times.         To worder to shown above.           You can the data s	Receipt Number		Case Type 1539 - APPLIC STATUS	CATION TO EXTEND/CHA	NGE NONIMMIGRANT
Neurit Thin         Page (223/2019)         Page (of 1         Bendfieldry SUBRAMANYA, RANJITHA           RANTITHA SUBRAMANYA Cdo CATHERINE C KANG PORTER WRIGHT MORRIS ARTHUR 41 SOUTH HIGH STREET FLR 31 COLUMBUS OH 43215         Notice Type: Reccipt Notice Amount received: \$455.00 U.S.           This notice confirms that USCIS received your application or petition ("this case") as shown above.         Notice Type: Reccipt Notice Amount received: \$455.00 U.S.           This notice confirms that USCIS received your application or petition ("this case") as shown above.         Notice Type: Reccipt Notice Amount received: \$455.00 U.S.           Up can receive deplots on your case by visiting www.uscis,gov/casestatus to you can come: with the USCIS Contact Center at www.uscis,gov/casestatus and your case, you can come case you can commet with the application or petition the receipt number shown above.           You can receive deplots on your case by visiting www.uscis,gov/casestatus to you tan create an account at my.uscis.gov/casestatus receipted number shown above.         Note and the petition status or benefit, nor is it evidence that this case is still pending. It only shows that the application or petition was receipted on the data show.           Provessing time - Processing times two to be the careet processing times by form type: a about your case online at www.uscis.gov/carcuet.         Ny ow how mallable at www.uscis.gov/factostos or at about your case online at www.uscis.gov/factostostor at about your case on the careet processing time. You or you and and update or spretce careets: a about your case on the careet processing times two and something form you, we will notify you by you mail and update ore spretite.		Priority Date		YA, RANJITHA	
RANJITHA SUBRAMANYA c/o CATHERNE C KANG PORTER WRIGHT MORRIS ARTHUR 41 SOUTH HIGH STREEF FLR 31 COLUMBUS OH 43215       Notice Type: Receipt Notice Amount received: \$455.00 U.S.         This notice confirms that USCIS received your application or petition ("dis case") as shown above.       If any of the Information in your notice is informed on you have any questions about your case, or you have any questions about your case, or you have any questions about your case, you can connect with the USCIS Contact Center at www.uscis, gov/contactenter or a sub-way auxies, gov/casestatus to got the latest status or you can connect with the USCIS Contact Center at www.uscis, gov/contactenter or a sub-way auxies, gov/casestatus to got the latest status or you can cente an account at my uscis, gov/account an receive unglates for your case.         This notice does not grant any immigration status or benefit, nor is it evidence that this case is still pending. It only shows that the application or petition way receipted on the dae shown.         Prove and receive and layout case by visiting to see the carrent processing times by form type.         Visiti www uscis, gov/necestary.         Visiti www uscis, gov/necestary.         Wisiting to a strate stoper or got and stoper or got and the day shown.         Prove and receive an initial ducision or update within our current processing time, you can try our online tools available at www.uscis.gov/necestary.         When we make a decision on your case of two needs something, please visit www.uscis.gov/datesschange for information on how to update your address changes - If you move while your address for all your receipt numbers.         Return of Original Documents - Las Form G-848, Request for the	Notice Date		Beneficiary		
If any of the Information in your notice is incorrect or you have any questions about your case, you can connect with the USCIS Contact Center at www.uscis.gov/contactenter or ask about your case online at www.uscis.gov/casestatus to get the latest status or you can create an account at my.uscis.gov/account an receive updates on your case by visiting www.uscis.gov/casestatus to get the latest status or you can create an account at my.uscis.gov/account an receive updates on your case. This notice does not grant any immigration status or benefit, nor is it evidence that this case is still pending. It only shows that the application or petition was receipted on the date shown. Processing times vary by form type. You do not receive an initial decision or update within our current processing time, you can try our online tools available at www.uscis.gov/roots or as about your case online at www.uscis.gov/roots case is gov/roots or as about your case online at www.uscis.gov/roots case is gov/roots available. Theyour address changes - If you more while your case is pending. If you you have success and they your access in grant get as the pending. If you you have success and you are case is pending. If you you have a decision on your case is pending. If you you have success and you you can case is pending. If you you have success and you are case is pending. If you you have a decision on your case is pending. If you you have a decision on your case or if we need something from you, we will notly you by mail and update our systems. If your address changes - If you more while your ackies pending. Jelaes visit www.uscis.gov/addresschange for information on how to update your address for all your receipt numbers. Retern of Original Documents - Use Form G-884. Request for the Return of Original Documents. to request the return of original documents submitted to establish eligibility for an immigration and wator pendie documentation on USCI Bit.gov una request requesting antitype documents is obtain a single USCI Bit. However	c/o CATHERINE C K. PORTER WRIGHT M 41 SOUTH HIGH STR	ANG ORRIS ARTHUR EET FLR 31			-
<ul> <li>was receipted on the date shown.</li> <li>Processing time - Processing times vary by form type.</li> <li>Visit www.uscis.gov/processingtimes to see the current processing times by form type and field office or service center.</li> <li>If you do not receive an initial decision or update within our current processing time, you can try our online tools available at www.uscis.gov/hools or as about your case online at www.uscis.gov/hools or as is pending, please visit www.uscis.gov/hools or as is pending, please visit www.uscis.gov/hools or as about your case on if we need something from you, we will notify you by mail and update our systems.</li> <li>If your address changes - If you move while your case is pending, please visit www.uscis.gov/hodfesschange for information on how to update your address. Remember to update your address for all your receipt numbers.</li> <li>Return of Original Documents - Use Form G-884. Request for the Return of Original Documents, to request the return of original documents submitted to establish eligibility for an immigration or citizenship benefit. You only need to submit one Form G-884 if you are requesting multiple documents contained in a single USCIS file. However, if the requested documentation is in more than one USCIS file, you was to obtain your mother's information.)</li> <li>NOTICE: Under the Immigration and Nationality Act (INA), the information you provide on and in support of applications and petitons is submitted under the penalty of perityur. USCIS and the US. Department of Homeland Security reserve the right to weif this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct sile for he benefit you suek. If we find any decegatory information, we will for the benefit you suek. If we find any decegatory information, we will follow the law in d</li></ul>	If any of the information in y www.uscis.gov/contactcenter the receipt number shown abov You can receive updates on you	our notice is incorrect or you or ask about your case online at /e. ur case by visiting www.uscis.	h have any questions about you t www.uscis.gov/e-request. You	r case, you can connect with will need your Alien Registra	ation Number (A-Number) and/or
address. Remember to update your address for all your receipt numbers. Return of Original Documents - Use Form G-884. Request for the Return of Original Documents, to request the return of original documents submitted to establish eligibility for an immigration or citizenship benefit. You only need to submit one Form G-884 if you are requesting multiple documents contained in a single USCIS file. However, if the requested documentation is in more than one USCIS file, you must submit a separate request for each file. (For example: If you wish to obtain your mother's birth certificate and your parents' marriage certificate, both of which are in the USCIS file that pertains to her submit one Form G-884 with your number's information.) NOTICE: Under the Immigration and Nationality Act (INA), the information you provide on and in support of applications and petitions is submitted under the penalty of perjury. USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mall, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you see. If we find any dergatory information, we will the find my dergatory information, we will use the information obtained to determine whether you are eligible for the benefit you suck if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings. Beneficiary(ies): Name SUBRAMANYA, RANJITHA DOB COB COB COB COB COB Cob SUBRAMANYA, RANJITHA Please see the additional information on the back. You will be notified separately about any other cases you filed. Nebraska Service Center U.S. CITIZENSHIP & IMMIGRATION SVC P.	<ul> <li>was receipted on the date show</li> <li>Processing time - Processing</li> <li>Visit www.uscis.gov/proces</li> <li>If you do not receive an init about your case online at w</li> <li>When we make a decision of</li> </ul>	m, imes vary by form type, singtimes to see the current pre- ial decision or update within or ww.uscis.gov/e-request, m your case or if we need some	ocessing times by form type and ur current processing time, you c ething from you, we will notify y	field office or service center, an try our online tools availa rou by mail and update our sy	ble at www.uscis.gov/tools or ask
under the penalty of perjury. USCIS and the U.S. Department of Horneland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information or we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.  Beneficiary(ies): Name DOB COB COB Class SUBRAMANYA. RANJITHA OI	address. Remember to update Return of Original Documen establish eligibility for an imm in a single USCIS file. Howeve example: If you wish to obtain	your address for all your receip ts - Use Form G-884, Request igration or citizenship benefit. er, if the requested documentati your mother's birth certificate	t numbers. for the Return of Original Docur You only need to submit one For ion is in more than one USCIS fi	nents, to request the return of rm G-884 if you are requestin le, you must submit a separat	foriginal documents submitted to ng multiple documents contained te request for each file. (For
Name     DOB     COB     Class       SUBRAMANYA. RANJITHA     01     INDIA     Class	under the penalty of perjury. U a decision on your case so we of public information and records verification. We will use the in will follow the law in determin	SCIS and the U.S. Department can ensure that you have completed contact others by mail, the inter- formation obtained to determining whether to provide you (and	of Homeland Security reserve the lied with applicable laws, rules, r ternet or phone, conduct site inspanse whether you are eligible for the ad the legal representative listed of	he right to verify this informate egulations, and other legal at ections of businesses and rest e benefit you seek. If we find	tion before and/or after making athorities. We may review idences, or use other methods of any derogatory information, we
Nebraska Service Center U. S. CITIZENSHIP & IMMIGRATION SVC P.O. Box 82521 Lincoln NE 68501-2521	Name	۸.			Class
P.O. Box 82521 Lincoln NE 68501-2521		ation on the back. You will be	notified separately about any of	ner cases you filed.	
USCIS Contact Center: www.uscis.gov/contactcenter	P.O. Box 82521	RATION SVC			
	USCIS Contact Center: www.	uscis.gov/contactcenter			

If this is an interview or biometrics appointment notice, please see the back of this notice for important information.

Department of Homeland Security U.S. Citizenship and Immigration Services Form I-797C, Notice of Action

## THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

Receipt Number		Case Type 1765 - APPLICATION FOR EMPLOYMENT AUTHORIZATION
Received Date 12/23/2019	Priority Date	Applicant SUBRAMANYA, RANJITHA
Notice Date 12/23/2019	Page 1 of 2.	Beneficiary SUBRAMANYA, RANJITHA
RANJITHA SUBF c/o CATHERINE PORTER WRIGH 41 SOUTH HIGH COLUMBUS OH	C KANG T MORRIS ARTHUR STREET FLR 31	Notice Type: Reccipt Notice Amount received: \$410.00 U.S. Class requested: C26
listed above. It does NO	plication or petition ("your case") I T grant you any inmigration status or a decision on your case or if we need	sted above. This notice only shows that your case was filed on the "Received Date" immigration benefit, and it is not evidence that your case is still pending. We will notify you additional information.
	ther notices about your case for your r ble when you contact us about your ca	ecords. You should also keep copies of anything you send us, as well as proof of delivery. se.
If any of the information www.uscis.gov/contactce the receipt number shown	nter or ask about your case online at w	ave any questions about your case, you can connect with the USCIS Contact Center at ww.uscis.gov/e-request. You will need your Alien Registration Number (A-Number) and/or
You can receive updates receive email updates for		v/casestatus to get the latest status or you can create an account at my.uscis.gov/account and
	loyment Authorization Document (l case is still pending. However, if:	EAD) Extension - This notice, by itself, does not grant any immigration status or benefit,
<ul> <li>Your EAD renew</li> <li>The category on y beneficiary or app</li> <li>You do not receiv</li> <li>Then this Notice eard. If all of the EAD to your emp immediately term</li> </ul>	our current EAD matches the "Class F dicant, your EAD and this Notice mus c your renewal EAD before your current of Action automatically extends the va- above conditions apply with respect to loyer for employment eligibility verifi- inates, and you may not provide this N	r an automatic 180 day extension (see www.uscis.gov/I-765 for a list of categories); and tequested" listed on this Notice of Action (Note: If you are a Temporary Protected Status t contain either the A12 or C19 class, but they do not need to match each other.) and
	sing times vary by form type.	
<ul> <li>If you do not reco or ask about your</li> </ul>	ive an initial decision or update within case online at www.uscis.gov/e-reque	processing times by form type and field office or service center. our current processing time, you can try our online tools available at www.uscis.gov/tools st. mething from you, we will notify you by mail and update our systems.
You can receive updates	· · · · · · · · · · · · · · · · · · ·	
	tus Online website at www.useis.gov/ at my.useis.gov/account and receive e	easestatus. Provide your receipt number and get the latest update on your case. mail updates on your case.
SEPARATE appointment	notice with a specific date, time and p parate appointment notice and take it (	signature) for some types of cases. If we need biometrics from you, we will send you a lace for you to go to a USCIS Application Support Center (ASC) for biometrics processing. NOT this receipt notice) to your ASC appointment along with your photo identification.
<ul> <li>A passport or nati</li> </ul>	onal photo ID issued by your country,	
Please see the additional in	formation on the back. You will be no	tified separately about any other cases you filed.
Nebraska Service Center U. S. CITIZENSHIP & IM P.O. Box 82521 Lincoln NE 68501-2521	IMIGRATION SVC	
USCIS Contact Center:	www.uscis.gov/contactconter	
	E>	khibit A

If this is an interview or biometrics appointment notice, please see the back of this notice for important information.

Department of Homeland Security U.S. Citizenship and Immigration Services

## Form I-797C, Notice of Action

## THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

Receipt Number		Case Type 1765 - APPLICATION FOR EMPLOYMENT AUTHORIZATION
Received Date 12/23/2019	Priority Date	Applicant SUBRAMANYA, RANJITHA
Notice Date 12/23/2019	Page 2 of 2	Beneficiary SUBRAMANYA, RANJITHA

A driver's license,

A military photo ID, or

A state-issued photo ID card.

If you receive more than one ASC appointment notice (even for different cases), take them both to the first appointment date.

If your address changes - If you move while your case is pending, please visit www.uscis.gov/addresschange for information on how to update your address. Remember to update your address for all your receipt numbers.

Return of Original Documents - Use Form G-884, Request for the Return of Original Documents, to request the return of original documents submitted to establish eligibility for an immigration or citizenship benefit. You only need to submit one Form G-884 if you are requesting multiple documents contained in a single USCIS file. However, if the requested documentation is in more than one USCIS file, you must submit a separate request for each file. (For example: If you wish to obtain your mother's birth certificate and your parents' marriage certificate, both of which are in the USCIS file that pertains to her, submit one Form G-884 with your mother's information.)

NOTICE: Under the Immigration and Nationality Act (INA), the information you provide on and in support of applications and petitions is submitted under the penalty of perjury. USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information, we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.

Please see the additional information on the back. You	ill be wriffed examplely about ony orbo	consor you filed
Nebraska Service Center U. S. CITIZENSHIP & IMMIGRATION SVC P.O. Box 82521 Lincoln NE 68501-2521	win oc notineu separatery about any othe	
USCIS Contact Center: www.uscis.gov/contactcente	F	
	Exhibit A	

If this is an interview or biometrics appointment notice, please see the back of this notice for important information.

## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-2 Filed: 07/22/20 Page: 1 of 1 PAGEID #: 24

**Department of Homeland Security** U.S. Citizenship and Immigration Services

## Form I-797C, Notice of Action

## THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

	APPLICATION/PETITION/REQUES	I NI MBER	NOTICE DAT 12/27/2019
CASE TYPE 1539 - APPLICATION TO EXTEND/CHANGE NONIMMIGRANT STATUS	SOCIAL SECURITY NUMBER	USCIS A#	CODE 3
CCOUNT NI MBER	TCR	SERVICE CENTER NSC	PAGE 1 of 1
RANJITHA SUBRAMANYA c/o CATHERINE C KANG 41 SOUTH HIGH STREET FLR 31 COLUMBUS OH 43215			
To process your application, petition, or request, the U.S. Citizenship & Im PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CE IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR APPLICATIO	NTER (ASC) AT THE DATE A?	D TIME SPECIFIED.	ABANDONED.
APPLICATION SUPPORT CENTER USCIS COLUMBUS 5466 Westerville Pike - Alum Creek Plaza Westerville OH - 43081		ENTIRE NOTICE CAR TME OF APPOINTMEN 01/17/2020 10:00AM	
WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO 1 1. THIS APPOINTMENT NOTICE and 2. PHOTO IDENTIFICATION. Naturalization applicants must bring their license, national ID, military ID, or State-issued photo ID. If you appear with	r Alien Resident Card. All other ag hout proper identification, you wil	plicants must bring a passp	
NOTE: USCIS may use your fingerprints to check the criminal history ree using the procedures outlined within Title 28 C.F.R., Section 16.32. The pro-	ords of the FBI. You may obtain a	copy of your own FB1 iden ate your FB1 identification r	tification record record are outline
NOTE: USCIS may use your fingerprints to check the criminal history rec using the procedures outlined within Title 28 C.F.R., Section 16.32. The pro within Title 28, C.F.R., Section 16.34. NOTE: If the USCIS ASC is <u>closed</u> due to inclement weather or for other	ords of the FBI. You may obtain a beedures to change, correct, or upd unforescen circumstances, USCIS	ate your FBI identification i	record are outline
NOTE: USCIS may use your fingerprints to check the criminal history ree using the procedures outlined within Title 28 C.F.R., Section 16.32. The pro within Title 28, C.F.R., Section 16.34. NOTE: If the USCIS ASC is <u>closed</u> due to inclement weather or for other appointment for the next available appointment date and mail you a notice y	ords of the FBI. You may obtain a beedures to change, correct, or upd unforescen circumstances, USCIS	ate your FBI identification i	record are outline
CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES # NOTE: USCIS may use your fingerprints to check the criminal history ree using the procedures outlined within Title 28 C.F.R., Section 16.32. The pro- within Title 28, C.F.R., Section 16.34. NOTE: If the USCIS ASC is <u>closed</u> due to inclement weather or for other appointment for the next available appointment date and mail you a notice w REQUEST FOI Please reschedule my appointment. Once USCIS receives your require your records, then mail the original with your request to BPU, Alexandria A	ords of the FBI. You may obtain a secdures to change, correct, or upd unforeseen circumstances, USCIS with the new date and time. RESCHEDULING est, you will be sent a new appoint	ate your FBI identification r will <u>automatically resched</u> ment notice. Make a copy o	record are outline hule your f this notice for
NOTE: USCIS may use your fingerprints to check the criminal history ree asing the procedures outlined within Title 28 C.F.R., Section 16.32. The pro- sithin Title 28, C.F.R., Section 16.34. NOTE: If the USCIS ASC is <u>closed</u> due to inclement weather or for other appointment for the next available appointment date and mail you a notice v <b>REQUEST FOI</b> Please reschedule my appointment. Once USCIS receives your require your records, then mail the original with your request to BPU, Alexandria A	ords of the FBI. You may obtain a secdures to change, correct, or upd unforeseen circumstances, USCIS with the new date and time. RESCHEDULING est, you will be sent a new appoint	ate your FBI identification r will <u>automatically_resched</u> ment notice. Make a copy o wy. Alexandria, VA 22309-	record are outline lule your f this notice for
NOTE: USCIS may use your fingerprints to check the criminal history ree using the procedures outlined within Title 28 C.F.R., Section 16.32. The pro- within Title 28, C.F.R., Section 16.34. NOTE: If the USCIS ASC is <u>closed</u> due to inclement weather or for other appointment for the next available appointment date and mail you a notice v <b>REQUEST FOI</b> Please reschedule my appointment. Once USCIS receives your requi- your records, then mail the original with your request to BPU. Alexandria A	ords of the FBI. You may obtain a secdures to change, correct, or upd unforescen circumstances, USCIS with the new date and time. <b>RESCHEDULING</b> est, you will be sent a new appoint SC, Suite 100, 8850 Richmond Hy <b>Exhibit</b> S Contact Center at 1-800-375-55	B	record are outling lule your f this notice for 1586

# ANHE UNITABLY STATES OF AMERIC

#### I-797A | NOTICE OF ACTION | DEPARTMENT OF HOMELAND SECURITY U.S. CITIZENSHIP AND IMMIGRATION SERVICES

laceived Date		1539 - APPLICATION TO	EXTEND/CHANGE NONIMMIGRANT STATUS
12/23/2019	Priority Date	Applican SUBRAMANYA, RANJITT	RA
Totice Date	Page 1 of 1	Beneficiary	μa
RANJITHA SUBRA c/o CATHERINE C PORTER WRIGHT 41 SOUTH HIGH S' COLUMBUS OH 4	KANG MORRIS ARTHUR FREET FLR 31	Class: H	Type: Approval Notice 14 am 06/08/2020 to 96/07/2023
The above application for e	extension of stay is approved. The tem	porary stay of the named applicant(s) is authorized	to the date shown above.
The I-94 attached below ma principal alien's nonimmig	ay contain a grace period of up to 10 c rant classification. The following prin -1, O-2, P-1, P-2, P-3, TN-1, and TN-	ays before and up to 10 days after the above validit	
The nonimmigrant status of	f the applicant(s) is based on the separ	ate nonimmigrant status held by a principal alien's	authorized employment in the United States.
The applicant must keep the he U.S. Department of Ho	e lower portion with his or her previou meland Security. The I-94 portion sho	is Form I-94. Departure Record. It must be presente ald be given to the U.S. Customs and Border Protect	ed when requested by USCIS or any other component of thon when he or she leaves the United States.
	form carefully for more information.	1998 A 1992 (1997 A 1978) A	
			sulations, and other legal authorities. We may review
will use the information ob whether to provide you (an	tained to determine whether you are e d the legal representative listed on you	igible for the benefit you seek. If we find any derog	
will use the information ob whether to provide you (and decision on your case or ste	tained to determine whether you are e d the legal representative listed on you art proceedings.	igible for the benefit you seek. If we find any derog	gatory information, we will follow the law in determini to address that information before we make a formal
will use the information ob- whether to provide you (and decision on your case or sta Please see the additional in Aermont Service Center J. S. CITIZENSHIP & IM 75 Lower Welden Street Saint Albans VT 05479-00	tained to determine whether you are e d the legal representative listed on you at proceedings. formation on the back. You will be a MIGRATION SVC	igible for the benefit you seek. If we find any derog r Form G-28, if you submitted one) an opportunity	
will use the information ob- whether to provide you (and decision on your case or sta Please see the additional in Aermont Service Center J. S. CITIZENSHIP & IM 75 Lower Welden Street Saint Albans VT 05479-00	tained to determine whether you are e d the legal representative listed on you at proceedings. formation on the back. You will be a MIGRATION SVC	igible for the benefit you seek. If we find any derog r Form G-28, if you submitted one) an opportunity notified separately about any other cases you filed	gatory information, we will follow the law in determini to address that information before we make a formal
will use the information ob- whether to provide you (and decision on your case or sta lease see the additional in fermont Service Center I. S. CITIZENSHIP & IM 5 Lower Welden Street aint Albans VT 05479-00 iSCIS Contact Center: w Detach This Half fo Receipt# LIN: -94# 90	tained to determine whether you are e d the legal representative listed on you at proceedings. formation on the back. You will be to MIGRATION SVC 01 sww.uscis.gov/contactcenter r Personal Records	igible for the benefit you seek. If we find any derog r Form G-28, if you submitted one) an opportunity notified separately about any other cases you filed PLEASE TEAR OFFFORM Receipt Number	gatory information, we will follow the law in determini to address that information before we make a formal
will use the information ob- whether to provide you (and lecision on your case or sta- lease see the additional in fermont Service Center S. CITIZENSHIP & IM 5 Lower Welden Street aint Albans VT 05479-00 (SCIS Contact Center: w Detach This Half for Receipt# LIN: -94# 90 IAME SUBRAMAN LASS H4	tained to determine whether you are e d the legal representative listed on you at proceedings. formation on the back. You will be a MIGRATION SVC 01 www.uscis.gov/contactcenter r Personal Records	igible for the benefit you seek. If we find any derog r Form G-28, if you submitted one) an opportunity notified separately about any other cases you filed PLEASE TEAR OFF FORM Receipt Number US Citizenship an 194 Departure Re	gatory information, we will follow the law in determini to address that information before we make a formal , , , , , , , , , , , , , , , , , , ,
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## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-3 Filed: 07/22/20 Page: 2 of 3 PAGEID #: 26

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1-797 NOTICE OF ACTION | DEPARTMENT OF MOMELAND SECURITY

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Receipt Number	USCIS Account Number Case Type 1765 - APPLICATION FOR EMPLOYMENT AUTHORIZATION		
Received Date 12/23/2019	Priority Date	Applicant	
		RANJITHA SUBRAMANYA	
Notice Date 04/07/2020	Page 1 of 1		
c/o CATHERI PORTER WR	IGHT MORRIS ART GH STREET FLR 31	Class:	<b>Type:</b> Approval Notice C26 rom 04/07/2020 to 06/07/2023

We have approved your application for employment authorization. We will send your Employment Authorization Document (EAD) (also known as an EAD card or Form I-766) to you separately.

Your EAD card is proof that you are allowed to work in the United States. Show the card to your employer to verify your authorization to work during the dates on the card. You cannot use this approval notice as proof of your employment authorization.

When you receive your EAD card, please check that all the information on the card is correct. If you need to change any information on the card, please mail all of the following to the office listed below:

· A letter explaining what information needs to be corrected,

- Your EAD card,
- · A photocopy of this notice, and
- Evidence to show what the correct information should be. For example, if you need to correct your name, submit a copy of your birth certificate or official name change.

If You Have a Pending Form I-485

If you have a pending or approved Form 1-140 and a pending Form 1-485, you may request to change employers if your Form 1-485 has been pending for at least 180 days. In order to do so, you need to submit documentation about your new job offer. For more information on how to request a change of employers and what information you must submit, please visit the USCIS website at www.uscis.gov.

If your EAD card expires before we make a final decision on your Form I-485, you may apply for a new EAD card.

#### THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION.

Exhibit C

**NOTICE:** Although this application or petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information, we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

Vermont Service Center U. S. CITIZENSHIP & IMMIGRATION SVC 75 Lower Welden Street Saint Albans VT 05479-0001





FORM 1-797 [REV. 08/01/16]

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## 1-797 NOTICE OF ACTION DEPARTMENT OF HOMELAND SEGURITY

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Receipt Number	USCIS Account Number	Case Type 1765 - APPLICATION FOR I	EMPLOYMENT AUTHORIZATION	
Received Date 12/23/2019	Priority Date	Applicant Americant RANJITHA SUBRAMANYA		
Notice Date 07/06/2020	Page 1 of 1			
c/o CATHER PORTER WR	IGHT MORRIS AR IGH STREET FLR 3		Notice Type: Approval Notice Class: C26 Valid from 04/07/2020 to 06/07/2023	
	ed your application for c n I-766) to you separately.		vill send your Employment Authorization Document (EAD) (also kn	own as ar
Your EAD card is	s proof that you are allowe		now the card to your employer to verify your authorization to work d syment authorization.	uring the
When you receive		neck that all the information on th	e card is correct. If you need to change any information on the card,	please
<ul><li>Your EAI</li><li>A photoco</li><li>Evidence</li></ul>	opy of this notice, and		le, if you need to correct your name, submit a copy of your birth cert	ificate or
for at least 180 da	ding or approved Form I-I tys. In order to do so, you	40 and a pending Form I-485, ye need to submit documentation ab ubmit, please visit the USCIS we	u may request to change employers if your Form 1-485 has been pen- out your new job offer. For more information on how to request a ch ibsite at www.uscis.gov	ding ange of
If your EAD card	expires before we make a	final decision on your Form I-48	5, you may apply for a new EAD card.	
THIS FORM IS	NOT A VISA AND MA'	Y NOT BE USED IN PLACE O	F A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZA	TION.
information befor legal authorities. residences, or use find any derogate	e and/or after making a de We may review public infi other methods of verifica ry information, we will fo	cision on your case so we can en ormation and records, contact off tion. We will use the information flow the law in determining whet	nd the U.S. Department of Homeland Security reserve the right to ve sure that you have complied with applicable laws, rules, regulations, ers by mail, the internet or phone, conduct site inspections of busines obtained to determine whether you are eligible for the benefit you se her to provide you (and the legal representative listed on your Form 6 formal decision on your case or start proceedings.	and other ses and ek. If we
Please see the add	itional information on the	back. You will be notified separa	tely about any other cases you filed.	
Vermont Service U. S. CITIZENSI- 75 Lower Welden Saint Albans VT (	IIP & IMMIGRATION SV Street	/C		
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USCIS Contact (	Center: www.uscis.gov/co		bit C	

## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-4 Filed: 07/22/20 Page: 1 of 4 PAGEID #: 28

U.S. Department of Homeland Security VERMONT SERVICE CENTER 75 LOWER WELDEN STREET SAINT ALBANS.VT 05479



U.S. Citizenship and Immigration Services

Monday, May 18, 2020

KANG, CATHERINE PORTER WRIGHT MORRIS ARTHUR LLP 41 S HIGH ST FL 31 COLUMBUS OH 43215

#### ATTORNEY COPY

#### RANJITHA SUBRAMANYA



E OH 43002

#### Dear Ranjitha Subramanya:

On 05/04/2020, you or the designated representative shown below, contacted us about your case. Some of the key information given to us at that time was the following:

Person who contacted us: Caller indicated they are: Attorney Name: Case type: Filing date: Receipt #: Referral ID: Beneficiary (if you filed for someone else): Your USCIS Account Number (A-number): Type of service requested: Kang, Catherine Attorney or Authorized Representative KANG, CATHERINE 1765 12/23/2019 LIN-SR11252000620NSC Information not available Information not available Non-Delivery of Employment Authorization Card

Exhibit

The status of this service request is:

We are sending your case for review. It is not necessary to submit multiple requests for corrective action. Your request for a review of this application/petition will be completed as quickly as our resources allow. Please allow a minimum of 60 days for this office to request, receive and review the file.

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- To stay current on your case, we have tools to help you at www.uscis.gov/tools and my.uscis.gov, including:
- Sign up for automatic case updates in myUSCIS: my.uscis.gov/account
- Ask our virtual assistant Emma: www.uscis.gov/emma
- Check your case status: www.uscis.gov/casestatus
- Check processing times: www.uscis.gov/processingtimes

Address Changes: If you move, please visit www.uscis.gov/addresschange for information on how to update your address. Remember

to update your address for all your receipt numbers.

If you try our online tools and still need help, please call the USCIS Contact Center at 800-375-5283 or 800-767-1833 (TDD for the

U.S. CIS - 05-18-2020 08:46 AM CDT - LIN-20-070-51061

Online Services

## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-4 Filed: 07/22/20 Page: 2 of 4 PAGEID #: 29

hearing impaired).

Thank you for your inquiry. We appreciate your continued patience.

U.S. CIS - 05-18-2020 08:46 AM CDT - LIN-20-070-51(6) Exhibit D

## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-4 Filed: 07/22/20 Page: 3 of 4 PAGEID #: 30

## Kang, Catherine C.

From: Sent: To: Subject: USCIS <USCIS-CaseStatus@dhs.gov> Wednesday, July 8, 2020 9:48 AM Kang, Catherine C. #EXT# Your recent inquiry (receipt #LIN-20customer communication)

#External Email#

U.S. Department of Homeland Security VERMONT SERVICE CENTER 75 LOWER WELDEN STREET SAINT ALBANS, VT 05479

U.S. Citizenship and Immigration Services Wednesday, July 8, 2020

Emailed to ckang@porterwright.com

Dear Ranjitha Subramanya:

On 06/26/2020, you or the designated representative shown below, contacted us about your case. Some of the key information given to us at that time was the following:

Person who contacted us: -- Kang, Catherine

Caller indicated they are: -- Attorney or Authorized Representative

Attorney Name: -- KANG, CATHERINE

Case type: -- 1765

Filing date: -- 12/23/2019

Receipt #: -- LIN-

Re

Beneficiary (if you filed for someone else): -- Information not available

Your USCIS Account Number (A-number):

1

Exhibit D

## Case: 2:20-cv-03707-ALM-EPD Doc #: 1-4 Filed: 07/22/20 Page: 4 of 4 PAGEID #: 31

-- Information not available

Type of service requested: -- Non-Delivery of Employment Authorization Card

The status of this service request is:

A review of U.S. Citizenship and Immigration Services (USCIS) records indicates your Form I-765, Application for Employment Authorization, was re-approved on July 6, 2020. As of the date of this letter, your Employment Authorization Document was in production. If you do not receive your card within 30 days, please contact the USCIS Contact Center at 1-800-375-5383.

We hope this information is helpful to you.

Online Services

To stay current on your case, we have tools to help you at www.uscis.gov/tools and my.uscis.gov, including: Sign up for automatic case updates in myUSCIS: my.uscis.gov/account

Ask our virtual assistant Emma: www.uscis.gov/emma

Check your case status: www.uscis.gov/casestatus

Check processing times: www.uscis.gov/processingtimes

Address Changes: If you move, please visit www.uscis.gov/addresschange for information on how to update your address. Remember to update your address for all your receipt numbers.

If you try our online tools and still need help, please call USCIS Contact Center at 800-375-5283 or 800-767-1833 (TDD for the hearing impaired).

Thank you for your inquiry. We appreciate your continued patience.

Exhibit D