

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

SVITLANA DOE, et al.,

Plaintiffs,

v.

Case No. 1:25-cv-10495-IT

KRISTI NOEM, in her official capacity  
as Secretary of Homeland Security;  
et. al,

Defendants.

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**DEFENDANTS' RESPONSE TO ORDER**

In response to the Court's June 6, 2025 Order (ECF No. 119), Defendants submit the attached Declaration of Kika Scott, Acting Deputy Director of U.S. Citizenship and Immigration Services (USCIS).

Date: June 9, 2025

Respectfully submitted,

YAAKOV M. ROTH  
*Acting Assistant Attorney General*

DREW ENSIGN  
*Deputy Assistant Attorney General*

BRIAN C. WARD  
*Acting Assistant Director*

/s/ Katherine J. Shinnors  
KATHERINE J. SHINNERS  
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ELISSA P. FUDIM  
*Trial Attorney*

*Counsel for Defendants*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 9, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which provided an electronic notice and electronic link of the same to all attorneys of record.

/s/ Katherine J. Shinnors

Katherine J. Shinnors

Senior Litigation Counsel

United States Department of Justice

Civil Division

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

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**Plaintiffs,**

**v.**

**KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, et al.;**

**Defendants.**

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**Civil Action No.**

**1:25-cv-10495-IT**

**DECLARATION OF KIKA SCOTT**

I, Kika Scott, make the following declaration, as permitted by Section 1746 of Title 28 of the United States Code. I am aware that this declaration will be filed in the above-captioned civil action with the United States District Court for the District of Massachusetts. I hereby certify:

1. I am the Acting Deputy Director of U.S. Citizenship and Immigration Services (USCIS), a component agency within the United States Department of Homeland Security (DHS). I have held this position since May 25, 2025. Previously I served as the senior official performing the duties of the USCIS director since Feb. 9, 2025. Before that, I served as the Chief Financial Officer (CFO) in the USCIS Office of the Chief Financial Officer since May 27, 2019.
2. The statements contained in this declaration are based upon my personal knowledge and upon information provided to me in my official capacity.
3. On May 28, 2025, the United States District Court for the District of Massachusetts issued a Memorandum and Order Granting Partial Relief on Plaintiffs' Motion for Preliminary Injunction and Stay of Administrative Action. See *Svitlana Doe, et al., v. Noem, et. al.*, No. 25-cv-10495 (D. Mass. May 28, 2025).
4. Pursuant to the District Court's May 28, 2025 order, Angelica Alfonso-Royals, Acting Director for USCIS issued a memorandum on June 9, 2025, with the subject line,

“Adjudication of Requests filed by Parolees Under Specified Parole Programs” (Alfonso-Royals Memo). The Alfonso-Royals Memo authorizes USCIS officers to adjudicate all pending benefits request filed by aliens who are or were paroled into the United States under Uniting for Ukraine (U4U), the parole processes for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV parole programs), and Family Reunification Parole (FRP) processes to a final agency action once USCIS has completed the additional vetting requirement for the parolees’ individual requests. The Alfonso-Royals Memo also authorizes USCIS officers to resume processing requests for re-parole and associated benefits for aliens paroled though a categorical parole program which were previously paused.

5. Adjudication of requests for *initial parole* and requests to be a supporter of a parolee under the following programs or processes remain on hold pending further review:
  - Uniting for Ukraine (U4U)
  - Family Reunification Parole (FRP) processes, including legacy Cuban Family Reunification Parole Program (CFRP) cases
  - Central American Minors (CAM) program
  - International Entrepreneur Parole
  - Parole of Western Hemisphere nationals interviewed for refugee status in Safe Mobility Offices (WHP).
6. The Alfonso-Royals Memo instructed that any other USCIS-wide administrative holds required by the Higgins or Davidson directives were no longer in effect and immediately lifted.
7. As of June 9, 2025, USCIS has lifted any hold on or suspension of the adjudication of (1) requests for re-parole and any associated benefits that may have been paused pursuant to the January 23, 2025 email from former Acting Director of U.S. Citizenship and Immigration Services, Jennifer B. Higgins; (2) requests for other immigration benefits filed by aliens who were paroled into the United States under the FRP and U4U programs as well as the CHNV parole programs, as set forth in the February 14, 2025 memorandum by former Acting Deputy Director of USCIS, Andrew Davidson, or in the Higgins email; and (3) any requests for Military Parole in Place and associated benefits (to the extent any individual case was held or

suspended).

8. Operational guidance, technical changes to USCIS systems, website virtual agent scripts, and other form communications necessary to execute the Alfonso-Royals Memo will be implemented.
9. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge. Executed this 9<sup>th</sup> day of June, 2025, in Camp Springs, Maryland.

**KIKA M SCOTT** Digitally signed by KIKA M SCOTT  
Date: 2025.06.09 16:24:46 -04'00'

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Kika Scott  
Acting Deputy Director  
U.S. Citizenship and Immigration Services  
Department of Homeland Security