UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

Blessed Cajuns, LLC, et al.,

Plaintiffs,

Case No. 4:21-cv-00677-O

v.

Isabella Casillas Guzman, et al.,

Defendants.

MOTION FOR CLASS CERTIFICATION

The plaintiffs respectfully move to certify a class under Rule 23(b)(2) of the Federal Rules of Civil Procedure. The proposed class is represented by the named Plaintiffs in this action, and it consists of "all restaurant owners and restaurants in the United States who are encountering or who will encounter race or sex discrimination from the Small Business Administration on account of section 5003 of the American Rescue Plan Act."

The accompanying brief provides our arguments and authorities.

Respectfully submitted.

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Dated: May 23, 2021

Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF CONFERENCE

I certify that I e-mailed Christopher D. Dodge, counsel for the defendants, at 8:57 P.M. pacific time on May 23, 2021, to ask his position on the motion, but I had not yet heard back from him at the time we filed.

CERTIFICATE OF SERVICE

I certify that on May 23, 2021, I served this document through CM/ECF upon:

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