

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

ANGE SAMMA *et al.*, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
DEFENSE, *et al.*,

Defendants.

No. 20-cv-01104-PLF

**NOTICE OF FILING CORRESPONDENCE REGARDING
CONTINUED NON-COMPLIANCE**

Plaintiffs respectfully submit this Notice of Filing to notify the Court of the attached letter, dated February 4, 2022, from Plaintiffs' counsel to Defendants' counsel, describing a continuing case of non-compliance.

Dated: February 4, 2022

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Respectfully submitted,

/s/ Sana Mayat
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Counsel for Plaintiffs

February 4, 2022

DELIVERED VIA EMAIL

Liam C. Holland
Trial Attorney
U.S. Department of Justice
Washington, D.C. 20530

Re: *Samma, et al. v. United States Department of Defense, et al.*, No.
20-CV-1104 (D.D.C.)



Dear Liam,

We are writing to raise a continuing case of non-compliance that was brought to class counsel's attention.

Class counsel recently communicated with class member Amdy Moustapha Niang, whose inability to obtain an N-426 certification class counsel first brought to Defendants' attention by letter on January 13, 2022. As described in that letter, Mr. Niang sought his N-426 certification multiple times—while serving in the Selected Reserve of the Ready Reserve of the U.S. Air Force, during Army basic combat training, and during Army advanced individual training—but was told each time that he must wait a minimum period of time to obtain an N-426 certification.

It has now been eight months since Mr. Niang began his service in the military and first sought his N-426 certification. It has been over three weeks since class counsel flagged his case to Defendants.

Class counsel request Defendants promptly certify Mr. Niang's N-426 form, which is attached again to this letter.

Sincerely,
Sana Mayat

Counsel to Plaintiffs

Encl.