



United States District Court for the Central District of
California

Chhoeun, et al. v. Giles, et al.

Case No. 8:17-cv-01898-JWH

Notice of Proposed Class Action Settlement

Authorized by the U.S. District Court for the Central District of California

PLEASE READ THIS NOTICE CAREFULLY.

IF YOU ARE:

- **A CAMBODIAN NATIONAL,**
- **WHO RECEIVED A DEPORTATION ORDER; AND**
- **WAS RELEASED FROM IMMIGRATION DETENTION,**

YOU MAY BE A CLASS MEMBER ENTITLED TO RELIEF.

Important things to know:

- A federal court has authorized this notice.
- This is not an advertisement.
- You are not being sued.
- You can learn more at: www.CambodiaSettlement.com

About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit brought on behalf of Cambodian nationals with deportation orders. **You received this notice because you may be a part of the group of people covered by the lawsuit, called the “class.”** This notice gives you information about the class action lawsuit, the proposed settlement, and your rights as a class member.

Learning About the Lawsuit

What is this lawsuit about?

Two Cambodian nationals, Nak Kim Chhoeun and Mony Neth (called “Petitioners”), brought this class action lawsuit on behalf of all Cambodian nationals with deportation orders who were released from immigration detention and have been or may be re-detained by U.S. Immigration and Customs Enforcement (“ICE”) to be deported to Cambodia. The lawsuit argues that ICE violated the rights of Cambodian nationals with deportation orders by re-detaining them for deportation without warning. The goal of the lawsuit is to require ICE to give notice to Cambodian nationals before re-detaining them, so that these individuals have an opportunity to explore legal challenges to deportation. The lawsuit does not ask for money.

Why is there a settlement agreement?

The Court ruled in favor of Petitioners and ordered ICE to provide notices to Cambodian nationals with deportation orders 14 days before they are re-detained for deportation. The Government has appealed that ruling and denies all claims of wrongdoing. Petitioners and their lawyers believe that the settlement is in the best interests of the class because it provides immediate benefits to class members while avoiding the risk of losing the case on appeal. The Government is settling to avoid the expense, inconvenience, and distraction of further litigation, which could take years.

Learning About the Settlement

What does the settlement provide?

Below is a summary of the key points in the settlement agreement. To get a copy of the full agreement, see the section entitled “Where Can I Get More Information?” after this summary.

1. Notices for Cambodians with deportation orders. ICE will mail an informational notice to all Cambodian nationals who have deportation orders and have been released from immigration detention. The notice will have two purposes:

First, the notice will remind the individual that they are subject to a final deportation order, and that ICE may take action to detain and deport them at some time in the future. However, the notice will not be a warning that ICE has immediate plans to detain or deport the individual. The fact that an individual receives a notice does not mean that they will be immediately detained or deported.

Second, the notice will provide information on how the individual can explore whether they have legal options to prevent deportation. Specifically, the notice will explain what a motion to “reopen” a deportation order is and provide information about free legal services providers. The notice will also include copies of certain documents from the individual’s immigration files and instructions on how to request the individual’s full immigration files, which would help an attorney figure out if a motion to “reopen” is possible.

2. Notices for Cambodians who receive new deportation orders. ICE will give an informational notice to all Cambodian nationals who receive deportation orders and are released from immigration detention after the settlement agreement is approved. This notice will be similar to the notice described above. For a three-year period, ICE will give these notices to individuals when they are released from immigration detention.
3. Lawyers’ fees and costs. The Government will pay \$500,000 to Class Counsel to reimburse them for their time and expenses on the case.
4. Giving up claims. For a three-year period, class members will not be able to sue the Government about the same claims that were brought in this lawsuit.

Key Resources

Where can I get more information?

The Court has appointed lawyers from the nonprofit organization Asian Law Caucus, the Stanford Law School Immigrants' Rights Clinic, and the law firm Sidley Austin LLP to represent the class. These lawyers are called Class Counsel. You can get a copy of the full settlement agreement and a copy of this notice by visiting Class Counsel's website or by emailing, calling, or writing to Class Counsel using the information below. Please do not call the Court to ask about this settlement.

Resource	Contact Information
Website	www.CambodiaSettlement.com
Your Lawyers	Chhoeun Class Counsel Asian Law Caucus 55 Columbus Avenue San Francisco, CA 94111 (415) 808-5256 cambodiasettlement@asianlawcaucus.org

Objecting

How can I object to the settlement?

If you like the settlement, you do not have to do anything.

If you do not like the settlement, you cannot "opt out" or exclude yourself from the settlement. But you can ask the Court to deny approval of settlement by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or deny the settlement. If the Court denies approval, the lawsuit will continue. If that is what you want to happen, you must object.

You can object to the settlement in writing. Written objections must include:

- The case name and number, *Chhoeun v. Giles*, Case No. 8:17-cv-01898-JWH;
- The class member's full name;
- The class member's or their attorney's current address and telephone number;
- An explanation of why the class member objects to the settlement agreement including any supporting documents; and
- Whether the class member intends to appear at the "Fairness Hearing," described below.

All written objections and supporting papers must be received on or before October 10, 2025. Copies must be mailed or hand-delivered to the Court and to counsel for both parties at **each** of the following addresses:

Class Action Clerk U.S. District Court for the Central District of California 411 West Fourth Street, Room 1053 Santa Ana, CA 92701-4516	Troy Liggett U.S. Department of Justice P.O. Box 878, Ben Franklin Station Washington, DC 20044	<i>Chhoeun</i> Class Counsel Asian Law Caucus 55 Columbus Avenue San Francisco, CA 94111
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Next Steps

When and where will the Court hold a hearing on the fairness of the settlement?

The Fairness Hearing is scheduled for November 25, 2025 at 10:00 a.m. before Honorable John W. Holcomb, United States District Judge, in Courtroom 9D, United States Courthouse, 411 West Fourth Street, Santa Ana, California 92701. Note that this date and time may change without further notice to the class. You can find out if the date and time has changed by visiting Class Counsel's website at www.CambodiaSettlement.com, or by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov>.

At the Fairness Hearing, Class Counsel and the Government will ask the Court to approve the proposed settlement agreement. If there are objections, the Court will consider them. If the Court decides that the settlement is fair, reasonable, and adequate, the Court may grant final approval of the settlement. You may appear at the Fairness Hearing yourself or through an attorney. If you want to appear through your own attorney, you are responsible for hiring and paying that attorney, and your attorney will need to file a notice of intent to appear with the Court.

Recommendation to update contact information with ICE

If the settlement agreement is approved, ICE will use the contact information currently on file for you to mail the informational notice required by the settlement. If you want to receive the benefits of the settlement agreement, it is important that you update your address with ICE. You may update your contact information with ICE by completing a change-of-address form online at <https://portal.ice.gov/ocoa>. You also may update your contact information by visiting the local ICE office where you attend check-ins.