

(i)); *see* ECF No. 166 (citing same).² Plaintiffs, however, misconstrue the meanings of those terms, arguing that the 425 people had “actually completed their approved travel into the United States,” while the remaining 818 people were “categorically approved to travel to the port of entry and *request* parole.” ECF No. 166 at 2-3.

Plaintiffs are incorrect: the 425 people “authorized parole” were “issued travel documents . . . to travel to the U.S. to seek parole from CBP,” but it is unknown whether they have traveled and been granted parole. *See* Evarts Decl., Ex. F (Resps. to Interrog. Nos. 1(e) & 8) (“USCIS is unable to report” on CBP’s data of paroles granted at ports of entry). Meanwhile, the people “recommended for parole” have been “forwarded for CAM parole consideration,” *see id.* (Resp. to Interrog. No. 1(h) n.4), such that they *may* be authorized parole if and only if they “complete additional processing steps.” *See* Garcia Decl. ¶¶ 11-15, ECF No. 125-1 (describing sponsorship requirement and medical exam); *see also* Evarts Decl., Ex. E at 7-8 (describing processing steps).

² Plaintiffs also reference, but do not cite, the data on ECF page 113. *See* Evarts Decl., Ex. F (Resp. to Interrog. No. 1(e)). More generally, the data underlying Plaintiffs’ objection correspond to CAM beneficiaries with sponsoring parents throughout the United States—*i.e.*, not limited to Texas. *See id.* (Resps. to Interrog. Nos. 1(e) & (h)).

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Certificate of Service

The undersigned certifies that on February 5, 2024, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the CM/ECF system. I hereby certify that I have served the documentation on all counsel by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) via the Court's CM/ECF filing system.

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