

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRÁN (SBN 302081)
12 *ebitran@aclusocal.org*

13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*
17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SÁNCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 UNITED STATES DISTRICT COURT
19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac VILLEGAS
22 MOLINA; Jorge HERNANDEZ
23 VIRAMONTES; Jason Brian GAVIDIA;
24 LOS ANGELES WORKER CENTER
25 NETWORK; UNITED FARM WORKERS;
26 COALITION FOR HUMANE
27 IMMIGRANT RIGHTS; IMMIGRANT
28 DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as
Secretary, Department of Homeland
Security; Todd M. LYONS, in his official
capacity as

Case No.: 2:25-cv-05605-MEMF-SP

**NOTICE OF MOTION AND MOTION FOR
CLASS CERTIFICATION AND
APPOINTMENT OF CLASS COUNSEL;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF**

Hon. Maame Ewusi-Mensah Frimpong

Date: September 24, 2025
Time: 9:00 a.m.
Courtroom: 8B

1 Acting Director, U.S. Immigration and
2 Customs Enforcement; Rodney S. SCOTT,
3 in his official capacity as Commissioner,
4 U.S. Customs and Border Patrol; Michael W.
5 BANKS, in his official capacity as Chief of
6 U.S. Border Patrol; Kash PATEL, in his
7 official capacity as Director, Federal Bureau
8 of Investigation; Pam BONDI, in her official
9 capacity as U.S. Attorney General; Ernesto
10 SANTACRUZ JR., in his official capacity as
11 Acting Field Office Director for Los
12 Angeles, U.S. Immigration and Customs
13 Enforcement; Eddy WANG, Special Agent
14 in Charge for Los Angeles, Homeland
Security Investigations, U.S. Immigration
and Customs Enforcement; Gregory K.
BOVINO, in his official capacity as Chief
Patrol Agent for El Centro Sector of the U.S.
Border Patrol; Jeffrey D. STALNAKER, in
his official capacity as Acting Chief Patrol
Agent, San Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official capacity
as Assistant Director in Charge, Los Angeles
Office, Federal Bureau of Investigation; Bilal
A. ESSAYLI, in his official capacity as U.S.
Attorney for the Central District of
California,

15 Defendants.

1 JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com

2 JAMIE LUMA (SBN 331610)
jamie.luma@mto.com

3 SARA H. WORTH (SBN 341088)
sara.worth@mto.com

4 HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com

5 MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com

6 KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com

7 MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor

8 Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

9 *Counsel for Stop/Arrest Plaintiffs*

11 JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org

12 LAUREN MICHEL WILFONG*
lwilfong@ndlon.org

13 NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

16 *Counsel for Stop/Arrest Plaintiffs*

17 BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
18 AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN
19 CALIFORNIA
39 Drumm Street
20 San Francisco, CA 94111
Tel: 415-621-2493

21 *Counsel for Stop/Arrest Plaintiffs*

22 BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
24 ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL COUNTIES
25 P.O. Box 87131
San Diego, CA 92138-7131
26 Tel: 619-398-4199

27 *Counsel for Stop/Arrest Plaintiffs*

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com

MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com

HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)

eaguilascho@farmworkerlaw.com
MARTÍNEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org

COALITION FOR HUMANE IMMIGRANT
RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org

BRYNNA BOLT (SBN 339378)
bbolt@immdef.org

ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT on September 24, 2025 at 9:00 a.m., before the
3 Honorable Maame Ewusi-Mensah Frimpong, in Courtroom 8B, Eighth Floor, 350 West First
4 Street, Los Angeles, CA, 90012, Plaintiffs Pedro Vasquez Perdomo, Isaac Villegas Molina, Jorge
5 Hernandez Viramontes, Jason Brian Gavidia (collectively, “the Individual Plaintiffs”), along with
6 the Los Angeles Worker Center Network (LAWCN), United Farm Workers (UFW), and the
7 Coalition for Humane Immigrant Rights (CHIRLA) (collectively, the “Organizational Plaintiffs”
8 and together with the Individual Plaintiffs, the “Stop/Arrest Plaintiffs” or “Plaintiffs”) will, and
9 hereby do, respectfully move the Court for an order certifying a class of plaintiffs as defined
10 herein, appointing the Stop/Arrest Plaintiffs as class representatives, and appointing the American
11 Civil Liberties Union Foundation of Southern California, the American Civil Liberties Union
12 Foundation of Northern California, the American Civil Liberties Union Foundation of San Diego
13 and Imperial Counties, the UC Irvine School of Law Immigrant and Racial Justice Solidarity
14 Clinic, Munger, Tolles & Olson, LLP, the National Day Laborer Organizing Network, the Law
15 Offices of Stacy Tolchin, and Public Counsel (collectively, the “Stop/Arrest Plaintiffs’ counsel) as
16 follows:

17 **Suspicionless Stop Class:** All persons who, since June 6, 2025, have been or will be
18 subjected to a detentive stop by federal agents for purposes of immigration
19 enforcement in this District, other than at a port of entry, checkpoint, or other
20 functional equivalent of the border, without a pre-stop, individualized assessment of
21 reasonable suspicion that the person to be stopped (1) is engaged in an offense
22 against the United States or (2) is a noncitizen unlawfully present in the United
23 States.

24 This motion is made pursuant to Rule 23 of the Federal Rules of Civil Procedure on the
25 grounds that the proposed class meets the requirements for class certification under Rule 23(a) and
26 Rule 23(b)(2), and members of the proposed class are similarly situated and have been or will be
27 subjected to the same unconstitutional policy and practice challenged in Count One of Plaintiffs’
28 Amended Complaint.

1 The motion is based on this Notice of Motion and Motion, the Memorandum of Points and
2 Authorities, the declarations and corresponding exhibits filed concurrently herewith, including
3 attachments, all pleadings and other papers on file in this action, and such further evidence and
4 argument as may be presented to the Court at or prior to the hearing on this motion.

5 The motion is made following the conference of counsel pursuant to L.R. 7-3 which took
6 place with Defendants on July 29, 2025 and with the Intervenor on July 31, 2025. Defendants
7 oppose the motion. Intervenor does not oppose.

8
9 Dated: August 7, 2025

Respectfully submitted,

10 ACLU FOUNDATION OF SOUTHERN
11 CALIFORNIA

12 By: /s/ Stephanie Padilla

13 Stephanie Padilla

14 *Counsel for Stop/Arrest Plaintiffs*
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	<u>Page</u>
I. INTRODUCTION.....	1
II. FACTUAL BACKGROUND	3
A. Defendants’ Officially Sanctioned Pattern and Practice of Suspicionless Stops.....	3
B. Proposed Class Representatives	4
1. Individual Plaintiffs.....	4
2. Organizational Plaintiffs	5
III. LEGAL STANDARD.....	8
IV. ARGUMENT	8
A. The Court Has Jurisdiction to Certify the Suspicionless Stop Class.....	9
B. The Stop/Arrest Plaintiffs Have Standing.....	9
C. The Proposed Class Meets the Requirements of Rule 23(a).....	9
1. The Suspicionless Stop Class is Numerous, and Joinder is Impracticable	9
2. The Suspicionless Stop Class Shares Common Questions of Law or Fact	11
3. The Named Plaintiffs’ Claims are Typical of the Suspicionless Stop Class Members	14
4. The Proposed Class Representatives and Class Counsel Will Fairly and Adequately Protect the Interests of the Class	16
D. The Proposed Class Meets the Requirements of Rule 23(b)(2)	18
V. CONCLUSION	20

TABLE OF AUTHORITIES

	Page(s)
FEDERAL CASES	
<i>A.B. v. Hawaii St. Dep't of Educ.</i> , <u>30 F.4th 828</u> (9th Cir. 2022).....	11
<i>Ali v. Ashcroft</i> , <u>213 F.R.D. 390</u> (W.D. Wash. 2003).....	11
<i>Ambrosia v. Cogent Commc'ns, Inc.</i> , <u>312 F.R.D. 544</u> (N.D. Cal. 2016)	10
<i>Amchem Prods., Inc. v. Windsor</i> , <u>521 U.S. 591</u> (1997)	16, 18, 19
<i>Amgen Inc. v. Conn. Retirement Plans & Trust Funds</i> , <u>568 U.S. 455</u> (2013)	8
<i>Armstrong v. Davis</i> , <u>275 F.3d 849</u> (9th Cir. 2001).....	12, 14
<i>B.K. ex rel. Tinsley v. Snyder</i> , <u>922 F.3d 957</u> (9th Cir. 2019).....	8
<i>C.R. Educ. & Enf't Ctr. v. Hosp. Props. Tr.</i> , <u>317 F.R.D. 91</u> (N.D. Cal. 2016)	10
<i>Cal. Rural Legal Assistance, Inc. v. Legal Servs. Corp.</i> , <u>917 F.2d 1171</u> (9th Cir. 1990).....	15
<i>Calvillo Manriquez v. DeVos</i> , <u>2018 WL 5316174</u> (N.D. Cal., Aug. 30, 2018).....	9
<i>Cruz v. MM 879, Inc.</i> , <u>329 F.R.D. 639</u> (E.D. Cal. 2019).....	12
<i>Doe #1 v. Trump</i> , 335 F.R.D.	12
<i>Doe #1 v. Trump</i> , <u>335 F.R.D. 416</u> (D. Or. 2020)	2
<i>Doe v. Wolf</i> , <u>424 F. Supp. 3d 1028</u> (S.D. Cal. 2020)	11
<i>Ellis v. Costco Wholesale Corp.</i> , <u>657 F.3d 970</u> (9th Cir. 2011).....	11

1	<i>Evon v. Law Offices of Sidney Mickell,</i>	
2	<u>688 F.3d 1015</u> (9th Cir. 2012).....	14, 16
3	<i>Gen. Tel. Co. of Sw. v. Falcon,</i>	
4	<u>457 U.S. 147</u> (1982)	16
5	<i>Gibson v. Local 40, Supercargoes and Checkers,</i>	
6	<u>543 F.2d 1259</u> (9th Cir. 1976).....	19
7	<i>Gonzalez v. ICE,</i>	
8	<u>975 F.3d 788</u> (9th Cir. 2020).....	2, passim
9	<i>Griggs v. Provident Consumer Discount Co.,</i>	
10	<u>459 U.S. 56</u> (1982)	9
11	<i>Hanlon v. Chrysler Corp.,</i>	
12	<u>150 F.3d 1011</u> (9th Cir. 1998).....	11
13	<i>Hanon v. Dataproducts Corp.,</i>	
14	<u>976 F.2d 497</u> (9th Cir. 1992).....	15
15	<i>Harris v. Palm Springs Alpine Ests., Inc.,</i>	
16	<u>329 F.2d 909</u> (9th Cir. 1964).....	9
17	<i>J.D. v. Azar,</i>	
18	<u>925 F.3d 1291</u> (D.C. Cir. 2019)	11
19	<i>Johnson v. City of Grants Pass,</i>	
20	<u>50 F. 4th 787</u> (9th Cir. 2022).....	9
21	<i>Just Film, Inc. v. Buono,</i>	
22	<u>847 F.3d 1108</u> (9th Cir. 2017).....	16
23	<i>Kidd v. Mayorkas,</i>	
24	<u>343 F.R.D. 428</u> (C.D. Cal. 2023)	2, 10, 15
25	<i>Lynch v. Rank,</i>	
26	<u>604 F. Supp. 30</u> , (N.D. Cal. 1984)	17
27	<i>Maney v. Brown,</i>	
28	<u>516 F.Supp.3d 1161</u> (D. Or. 2021).....	8
	<i>Melendres v. Arpaio,</i>	
	<u>784 F.3d 1254</u> (9th Cir. 2015).....	18
	<i>Ms. L v. U.S. Immigration & Customs Enforcement,</i>	
	<u>331 F.R.D. 529</u> (S.D. Cal. 2018).....	2, 12
	<i>Nightingale v. U.S. Citizenship & Immigr. Servs.,</i>	
	<u>333 F.R.D. 449</u> (N.D. Cal. 2019)	17

1	<i>One Unnamed Deputy Dist. Att'y v. Cnty. of Los Angeles,</i>	
2	<u>2011 WL 13128375</u> (C.D. Cal. Jan. 24, 2011).....	15
3	<i>Orantes-Hernandez v. Smith,</i>	
4	<u>541 F. Supp. 351</u> (C.D. Cal. 1982).....	10, 11, 14
5	<i>Ortega-Melendres v. Arpaio,</i>	
6	<u>836 F.Supp.2d 959</u> (D. Ariz. 2011).....	2, 13, 19
7	<i>Parsons v. Ryan,</i>	
8	<u>754 F.3d 657</u> (9th Cir. 2014).....	2, passim
9	<i>Perez-Olano v. Gonzalez,</i>	
10	<u>248 F.R.D. 248</u> (C.D. Cal. 2008)	12
11	<i>Rannis v. Recchia,</i>	
12	<u>380 F. App'x 646</u> (9th Cir. 2010).....	9
13	<i>Rodriguez v. Bostock,</i>	
14	<u>349 F.R.D. 333</u> (W.D. Wash. 2025).....	11, 16, 17
15	<i>Rodriguez v. Hayes,</i>	
16	<u>591 F.3d 1105</u> (9th Cir. 2010).....	12
17	<i>Sali v. Corona Reg'l Med. Ctr.,</i>	
18	<u>909 F.3d 996</u> (9th Cir. 2018).....	8
19	<i>Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.,</i>	
20	<u>559 U.S. 393</u> (2010)	8
21	<i>Spann v. J.C. Penney Corp.,</i>	
22	<u>307 F.R.D. 508</u> (C.D. Cal. 2015)	13
23	<i>Sueoka v. United States,</i>	
24	<u>101 F. App'x 649</u> (9th Cir. 2004).....	10
25	<i>United Farm Workers v. Noem,</i>	
26	<u>2025 WL 1235525</u> (E.D. Cal. Apr. 29, 2025)	2, 16
27	<i>United States v. Manzo Jurado,</i>	
28	<u>457 F.3d 928</u> (9th Cir. 2006).....	1
	<i>Vasquez Perdomo v. Noem,</i>	
	--- F.4th ---, <u>2025 WL 2181709</u> (9th Cir. Aug. 1, 2025)	9, 11
	<i>Victory v. Berks Cnty.,</i>	
	<u>2019 WL 2368579</u> (E.D. Pa., June 3, 2019)	9
	<i>Vietnam Veterans of Am. v. C.I.A.,</i>	
	<u>288 F.R.D. 192</u> (N.D. Cal. 2012)	15

1	<i>Wal-Mart Stores, Inc. v. Dukes</i> ,	
2	<u>564 U.S. 338</u> (2011)	8, passim
3	<i>Walters v. Reno</i> ,	
4	<u>145 F.3d 1032</u> (9th Cir. 1998).....	14, 19
5	<i>Wolin v. Jaguar Land Rover N. Am., LLC</i> ,	
6	<u>617 F.3d 1168</u> (9th Cir. 2010).....	15
7	FEDERAL RULES	
8	<u>Fed. R. Civ. P. 23</u>	passim
9	OTHER AUTHORITIES	
10	7A Wright, Miller & Kane, Fed. Practice & Proc. Civ. § 1763 (4th ed. 2025)	12
11	1 William B. Rubenstein, <i>Newberg and Rubenstein on Class Actions</i> § 3:12 (6th ed.).....	11

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

As Plaintiffs have demonstrated in their papers seeking a temporary restraining order, ECF 45. 81, and more recently in their Motion for Preliminary Injunction, ECF 128, Defendants have been engaged in a dragnet campaign of unlawful immigration operations in the field in Southern California, targeting individuals for, *inter alia*, detentive stops without reasonable suspicion. Rather than conducting individualized assessments of reasonable suspicion, Defendants' stops have violated governing Fourth Amendment case law because they have been based on discriminatory profiles, including: apparent race or ethnicity, speaking a foreign language or speaking English with an accent, where a person happens to be, and/or the type of work a person does. Defendants' unlawful conduct has not been disavowed by leadership; indeed, it has been encouraged, accepted, and approved by Defendants, including through their litigation positions in this case.

Through this motion, Plaintiffs seek to certify a class—the Suspicionless Stop Class—to challenge Defendants' policy and practice of unlawful detentive stops pursuant to Count One of Plaintiffs' Amended Complaint. ECF 16, ¶¶ 215-20. Defendants' immigration enforcement activities are bound by clear legal limits, and it is well established that “to establish reasonable suspicion, an officer cannot rely solely on generalizations that, if accepted, would cast suspicion on large segments of the law-abiding population.” *United States v. Manzo Jurado*, 457 F.3d 928, 935 (9th Cir. 2006). Defendants have defied these legal limits through their recent “roving patrols” and “collateral” stops, causing significant harm and constitutional injury to Plaintiffs and the putative class. Certification will give the Court further authority to address the injury that Plaintiffs and the putative class have suffered and will continue to suffer absent judicial intervention.

If there was ever a case where certification of a class was appropriate at this early stage of proceedings, it is this one. Evidence in the record shows that likely hundreds of residents of this District have already been impacted by Defendants' policy and practice since June 6, 2025, and that many more stand to be impacted without an injunction. Class members are subject to the same

1 pattern of conduct, and resolution of their claim plainly will require answering common legal and
2 factual questions. Moreover, the proposed class members' claims are typical of unnamed class
3 members—they share the same injury and seek the same relief—and they and proposed class
4 counsel will adequately represent the class. Finally, certification under Rule 23(b)(2) of the
5 Federal Rules of Civil Procedure is appropriate, as Defendants have acted and, absent an
6 injunction, will continue to act on grounds that are generally applicable to the proposed class as a
7 whole.

8 In certifying the proposed class, this Court would be following a long tradition of
9 certifying classes in cases in the immigration context, including those raising Fourth Amendment
10 claims. *See, e.g., United Farm Workers v. Noem*, No. 1:25-CV-00246 JLT CDB, 2025 WL
11 1235525, *43 (E.D. Cal. Apr. 29, 2025) (certifying two provisional classes challenging unlawful
12 detentive stops without reasonable suspicion and warrantless arrests without flight risk
13 assessment, respectively); *Gonzalez v. ICE*, 975 F.3d 788, 808, 812 (9th Cir. 2020) (upholding
14 certification of class of persons subjected to immigration detainers based on ICE's practice of
15 making probable cause determinations based on "only a check of an online database"); *Kidd v.*
16 *Mayorkas*, 343 F.R.D. 428, 443 (C.D. Cal. 2023) (certifying two classes corresponding to alleged
17 ICE warrantless home arrest practices); *Ortega-Melendres v. Arpaio*, 836 F.Supp.2d 959, 992 (D.
18 Ariz. 2011) (certifying a class of "[a]ll Latino persons who . . . have been or will be in the future,
19 stopped, detained, questioned or searched" unlawfully); *see also Ms. L v. U.S. Immigration &*
20 *Customs Enforcement*, 331 F.R.D. 529, 539 (S.D. Cal. 2018) (certifying a class where plaintiffs
21 challenged government's "practice of separating migrant parents and children"); *Doe #1 v. Trump*,
22 335 F.R.D. 416, 433–34 (D. Or. 2020) (certifying a class in a case challenging "systemic
23 immigration policies and procedures"). Courts routinely certify classes in systemic civil rights
24 challenges to law enforcement policies and practices. Indeed, "the primary role of [Rule 23(b)(2)]
25 has always been the certification of civil rights class actions." *Parsons v. Ryan*, 754 F.3d 657, 686
26 (9th Cir. 2014).

27 The proposed class Plaintiffs seek to certify here is defined as follows:
28

1 **Suspicionless Stop Class:** All persons who, since June 6, 2025, have been or will be
2 subjected to a detentive stop by federal agents for purposes of immigration
3 enforcement in this District, other than at a port of entry, checkpoint, or other
4 functional equivalent of the border, without a pre-stop, individualized assessment of
5 reasonable suspicion that the person to be stopped (1) is engaged in an offense against
6 the United States or (2) is a noncitizen unlawfully present in the United States.

7 For all the reasons stated below, Plaintiffs respectfully request that the Court certify the
8 Suspicionless Stop Class, appoint the Individual Plaintiffs (Mr. Vasquez Perdomo, Mr. Villegas
9 Molina, Mr. Hernandez Viramontes, and Mr. Gavidia) and three Organizational Plaintiffs
10 (LAWCN, UFW, and CHIRLA) as class representatives, and appoint Stop/Arrest Plaintiffs'
11 counsel as class counsel under Rule 23(a), (b)(2), and (g).

12 **II. FACTUAL BACKGROUND**

13 **A. Defendants' Officially Sanctioned Pattern and Practice of Suspicionless Stops**

14 Plaintiffs have previously set forth extensive evidence of Defendants' policy and practice
15 of suspicionless stops. To avoid the duplicative presentation of evidence already before the Court,
16 Plaintiffs hereby incorporate by reference the Stop/Arrest Plaintiffs' Application for a Temporary
17 Restraining Order and accompanying evidence, ECF 45 & ECF 45-1 to ECF 45-21, ECF 81 &
18 ECF 81-1 to ECF 81-2, and Stop/Arrest Plaintiffs' Motion for Preliminary Injunction and
19 accompanying evidence, ECF 128 & ECF 128-1 to ECF 128-12, as well as Plaintiffs' First
20 Amended Complaint, ECF 16.

21 To briefly summarize for purposes of the class certification analysis, the evidence shows a
22 clear pattern of raids at locations across the District, such as Home Depots, car washes,
23 agricultural sites, street corners, bus stops, tow yards, a swap meet, and other places where agents
24 and officers appear to believe they will encounter undocumented individuals. ECF 45 at 2-6; ECF
25 81 at 6; ECF 128 at 2-4. Individuals are identified as targets based on broad profiles, such as their
26 apparent race or ethnicity, use of Spanish or speaking English with an accent, their particular
27 location, and/or their occupation (or what agents or officers believe to be their occupation). ECF
28 45 at 6-9; ECF 128 at 4-8. Rather than approach the individuals for voluntary questioning,

1 Defendants seize the individuals by coming in swiftly and aggressively, often using physical force
2 or other methods to grab, surround, and block people, using instructions or commands, and
3 descending in large numbers, armed, masked, in tactical gear or military clothing, and refusing to
4 identify themselves. ECF at 9-12; ECF 128 at 8-10.

5 As this Court previously found, the evidence shows that Defendants' unlawful stops had
6 the "approval or authorization" of those in charge. ECF 87 ("TRO") at 35. Agents and officers
7 were expressly instructed to "push the envelope," go out to places like Home Depot and 7-Eleven
8 stores and round people up, and pursue "[a]ll collaterals." ECF 128 at 10 (internal citations
9 omitted); *see also* ECF 45 at 13-14; ECF 128 at 11-12 (describing further evidence of officials'
10 awareness and acceptance of unlawful conduct). Moreover, Defendants' submissions and litigation
11 position in this case confirm that their officially sanctioned practice is to target individuals for
12 detentive stops based not on any suspicion particularized to the person or worker, but based
13 merely on their presence at particular locations. ECF 128 at 6-7 (discussing Quinones declaration),
14 19-20 (discussing Harvick and Quinones declarations).

15 As Plaintiffs have previously detailed, Defendants have made clear their intent to continue
16 their policy and practice. ECF 128 at 12; *see also* ECF 45 at 15; ECF 81 at 6. As a result, absent
17 relief from the Court, Plaintiffs—and putative class members—citizens and noncitizens alike, face
18 the prospect of serious, continuing injury. ECF at 12-15; *see also* ECF 45 at 16-18.

19 **B. Proposed Class Representatives**

20 ***1. Individual Plaintiffs***

21 The experiences of Individual Plaintiffs Mr. Vasquez Perdomo, Mr. Villegas Molina, Mr.
22 Hernandez Viramontes, and Mr. Gavidia are representative of the Suspicionless Stop Class.

23 Plaintiffs Vasquez Perdomo and Villegas Molina each were detained (along with Plaintiff
24 Osorto) at a bus stop in Pasadena on June 18 where they were waiting to go to work. Officers had
25 no specific information about the men other than their Latino appearance and that they were
26 dressed in construction clothes. ECF 128 at 4-5; *see also* ECF 128 at 6-7; ECF 45 at 7. Plaintiffs
27 Vasquez Perdomo and Villegas Molina have now been released from detention and they fear being
28 stopped again based on their appearance, location, and/or the type of work they do. ECF 128 at 4-

1 5; ECF 45 at 16; ECF 128-7; Ex. 7, Third Declaration of Pedro Vasquez Perdomo (“Third
2 Vasquez Perdomo Decl.”) ¶ 14; Ex. 8, Third Declaration of Isaac Villegas Molina (“Third
3 Villegas Molina Decl.”) ¶ 12.¹

4 Plaintiff Hernandez Viramontes, a U.S. citizen, was detained and taken away from his
5 workplace—a car wash—based on his ethnicity and accent. ECF 128 at 5-7, 16; ECF 45 at 7.
6 Hernandez Viramontes continues to work at the same car wash, and he now carries his passport
7 card with him at all times. Ex. 9, Second Declaration of Jorge Hernandez Viramontes (“Second
8 Hernandez Viramontes Decl.”) ¶¶ 2, 4. He fears that he will be stopped again on account of his
9 ethnicity and accent. *Id.* ¶ 3; *see also* ECF 128 at 12-13; ECF 45 at 16.

10 Finally, Plaintiff Gavidia, also a U.S. citizen, was violently detained and interrogated about
11 his citizenship based solely on his ethnicity and presence at a tow yard. ECF 128 at 5, 7-8, 16; *see*
12 *also* ECF 45 at 7-8. Gavidia rents space at the tow yard, and intends to continue going there; he is
13 concerned that he will again be stopped based solely on his skin color and appearance. Ex. 10,
14 Second Declaration of Jason Brian Gavidia (“Second Gavidia Decl.”) ¶ 2; ECF 45-9 (Gavidia
15 Decl.) ¶¶ 12-13; *see also* ECF 128 at 12; ECF 45 at 16.

16 **2. Organizational Plaintiffs**

17 The Organizational Plaintiffs—LAWCN, UFW, and CHIRLA—bring claims on behalf of
18 their members and the putative class. ECF 16, ¶¶ 17-19. Members of the Organizational Plaintiffs
19 have experienced and fear being subject to Defendants’ policy and practice in the future.

20 **LAWCN** is a multi-industry organization comprised of worker centers and labor
21 organizations, including the CLEAN Carwash Worker Center, the Garment Worker Center, the
22 Koreatown Immigrant Workers Alliance, the Los Angeles Black Worker Center, the Philipino
23 Workers Center, and the Warehouse Worker Resource Center. ECF 45-12 (Gudino Decl.) ¶¶ 6, 13.
24 The CLEAN worker center, a member of LAWCN, has 1,800 members in the District and
25 numerous members who have been stopped and fear being stopped on the basis of their
26

27 ¹ Although Plaintiff Osorto has likewise been released, Plaintiffs are not asking that he be
28 appointed a class representative at this time.

1 appearance and occupation. ECF 128 at 13; ECF 45 at 16-17. For instance, on June 8, 2025,
2 federal agents grabbed and interrogated Jesus Aristeo Cruz Uitz—a CLEAN Carwash Worker
3 Center member—at his workplace, Westchester Car Wash, despite having no information other
4 than his appearance and presence at a car wash. ECF 45 at 8. Members of other worker centers
5 within LAWCN also reasonably fear being subject to Defendants’ suspicionless stops. Ex. 11,
6 Second Declaration of Armando Gudino (“Second Gudino Decl.”) ¶¶ 6-12 (describing members
7 of LAWCN worker center who face a likelihood of being stopped, including a day laborer who
8 lives in Pomona and has altered her daily routine following agents’ raid on a Home Depot close to
9 where she lives, and a warehouse worker in San Bernardino whose life has been upended and who
10 is afraid to go to church after agents entered her church and grabbed people including a U.S.
11 citizen); Ex. 12, Declaration of Catarin Posada (“Posada Decl.”) ¶¶ 4-6 (describing worker center
12 member and supermarket worker with work authorization who has nevertheless stopped working
13 and is reluctant to leave her home after seeing agents stationed in the parking lot of her
14 workplace); *see also* ECF 128 at 13; ECF 45 at 16-17.

15 Because LAWCN coordinates efforts to address issues impacting low wage workers across
16 industries in the greater Los Angeles area, and has a long-term and sustained focus related to
17 immigration and immigrant workers, ECF 45-2 (Gudino Decl.) ¶¶ 8-9, it is well-positioned to
18 represent the Suspicionless Stop Class. It has a demonstrated interest in ending the unlawful
19 practices that are harming its members. *See* Second Gudino Decl. ¶ 14.

20 UFW is the largest farm worker union in the country with approximately 10,000 members,
21 with more members in California than in any other state. Ex. 13, Third Declaration of Elizabeth
22 Strater (“Third Strater Decl.”) ¶¶ 5-6. Plaintiff UFW has multiple members, both citizens and
23 noncitizens, who are particularly vulnerable to unlawful immigration enforcement and who live in
24 continued fear that they will be racially profiled by agents who patrol the areas where they live,
25 work, and commute. ECF 128 at 13-14; ECF 45 at 17. For example, one UFW member was seized
26 for no evident reason other than his Latino appearance and his status as a day laborer. Third Strater
27 Decl. ¶¶ 29-30. A U.S. citizen, he fears being profiled and stopped again for the same reasons. *Id.*,
28 ¶ 31. In addition, UFW has observed “widespread panic” among members and reports that

1 members have avoided affected locations and even are foregoing basic needs due to roving patrols
2 and suspicionless stops. ECF 128 at 13-14; ECF 45 at 17.

3 Given its long history of advocacy to improve the lives, wages, and working conditions of
4 agricultural workers and their families, and its track record of working closely with members on
5 issues including those related to immigration and immigrants' rights, Third Strater Declaration,
6 ¶¶ 4, 11-14, UFW is well-positioned to represent the Suspicionless Stop Class. It is willing to
7 participate in this lawsuit to end the unlawful practices harming its members. Third Strater Decl.
8 ¶ 39.

9 Finally, **CHIRLA** is a membership-based organization with approximately 49,000
10 members in the District, consisting of predominantly Latine people, many of whom work in
11 industries that have been impacted by Defendants' raids. ECF 128 at 14-15; ECF 45 at 17-18.
12 CHIRLA has members, including U.S. citizens, those with legal status, and others, who are on
13 "constant alert," or have changed their routines, reduced their work schedules, or withdrawn their
14 children from school as a result of Defendants' actions. *Id.* CHIRLA members fear being stopped
15 because of their appearance, the language they speak, the places they go, and the types of work
16 they do. ECF 38-9 (Salas Decl.) ¶¶ 26-30; Ex. 14, Third Declaration of Angelica Salas ("Third
17 Salas Decl.") ¶¶ 6-10 (describing additional members who fear being stopped due to having dark
18 skin and facial features that mark them as visibly Latino, speaking Spanish in public, driving
19 vehicles with work tools in them, and/or due to their vocation as construction workers or a street
20 vendor, respectively).

21 CHIRLA is the largest statewide immigrant rights organization in California, providing
22 services to tens of thousands of residents each year and reaching hundreds of thousands through its
23 educational programs and events. ECF 38-9 (Salas Decl.) ¶¶ 3-4. CHIRLA also operates a hotline
24 where community members can call to ask questions and seek direct assistance, and it coordinates
25 the Los Angeles Rapid Response Network. *Id.*, ¶¶ 10-11. It is therefore well-positioned to
26 represent the Suspicionless Stop Class. It understands the responsibilities of being a class
27 representative and is prepared to take on the role. Third Salas Decl. ¶ 3.

1 **III. LEGAL STANDARD**

2 A party moving for class certification must show under Federal Rule of Civil Procedure
3 23(a) that: (1) the class is so numerous that joinder of all members is impracticable, (2) questions
4 of law or fact exist that are common to the class, (3) the claims or defenses of the representative
5 parties are typical of the claims or defenses of the class, and (4) the representative parties will
6 fairly and adequately protect the interests of the class. Fed. R. Civ. P. 23(a). In addition, the party
7 or parties must meet the criteria of at least one subsection of Rule 23(b). Plaintiffs whose suit
8 satisfies these requirements have a “categorical” right “to pursue his claim as a class action.”
9 *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 398 (2010).

10 Although the Court’s analysis under Rule 23 “may ‘entail some overlap with the merits of
11 the plaintiff’s underlying claim,’ ... [m]erits questions may be considered to the extent—but only
12 to the extent—that they are relevant to determining whether Rule 23 prerequisites for class
13 certification are satisfied.” *Amgen Inc. v. Conn. Retirement Plans & Trust Funds*, 568 U.S. 455,
14 465–66 (2013) (quoting *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 350 (2011) (internal
15 quotation marks omitted)). Finally, “[i]n resolving a dispute about whether class certification is
16 proper, the district court may consider material beyond the pleadings.” *Maney v. Brown*, 516
17 F.Supp.3d 1161, 1172 (D. Or. 2021); *see also Sali v. Corona Reg’l Med. Ctr.*, 909 F.3d 996, 1004–
18 05 (9th Cir. 2018) (holding that the “evidentiary proof” submitted in support of class certification
19 “need not be admissible evidence” at this stage); *cf. B.K. ex rel. Tinsley v. Snyder*, 922 F.3d 957,
20 974 (9th Cir. 2019) (holding that “plaintiffs can meet their evidentiary burden in part through
21 allegations when the allegations are detailed and supported by additional materials” and that even
22 “thin” evidence is “sufficient to corroborate the allegations at [the class certification] stage”).

23 **IV. ARGUMENT**

24 Plaintiffs satisfy the requirements of Rule 23(a) and Rule 23(b)(2). Plaintiffs and unnamed
25 class members alike require a uniform answer to the question at the heart of this case: whether
26 Defendants’ policy and practice of conducting detentive stops based not on individualized
27 assessments of reasonable suspicion, but rather broad profiles, violates the Constitution. Class
28 treatment serves the interests of judicial efficiency, ensures the parties receive complete relief, and

1 prevents potentially inconsistent decisions in materially identical cases.

2 **A. The Court Has Jurisdiction to Certify the Suspicionless Stop Class**

3 As an initial matter, the Court has jurisdiction to certify the Suspicionless Stop Class,
4 notwithstanding Defendants' appeal of its July 11 TRO. An appeal from an interlocutory order
5 impacts, at most, only the district court's jurisdiction over the "aspects of the case involved in the
6 appeal," not other matters. *Griggs v. Provident Consumer Discount Co.*, 459 U.S. 56, 58 (1982).
7 Accordingly, district courts may adjudicate class certification motions even while an appeal of an
8 injunction is pending. *See, e.g., Calvillo Manriquez v. DeVos*, 2018 WL 5316174, *3 (N.D. Cal.,
9 Aug. 30, 2018); *Victory v. Berks Cnty.*, 2019 WL 2368579, at *4 (E.D. Pa., June 3, 2019).

10 **B. The Stop/Arrest Plaintiffs Have Standing**

11 As discussed in the Stop/Arrest Plaintiffs' Motion for a Preliminary Injunction, both the
12 Individual and the Organizational Plaintiffs have Article III standing to seek injunctive relief. ECF
13 128 at 16-18; *see also supra* at 5-7 (discussing additional evidence that identifiable members of
14 the Organizational Plaintiffs have standing). In declining to stay this Court's TRO, the Ninth
15 Circuit examined in depth each of the Stop/Arrest Plaintiffs' standing to seek preliminary
16 injunctive relief, *see Vasquez Perdomo v. Noem*, --- F.4th ---, 2025 WL 2181709, at *9-*13 (9th
17 Cir. Aug. 1, 2025), and concluded that "all Plaintiffs—the individuals and associations—have
18 established their standing to seek prospective equitable relief." *Id.* at *13. There is no reason for
19 the Court to reach a different conclusion here.

20 **C. The Proposed Class Meets the Requirements of Rule 23(a)**

21 **1. The Suspicionless Stop Class is Numerous, and Joinder is Impracticable**

22 The proposed class easily satisfies Rule 23(a)(1)'s requirement that a class be "so
23 numerous that joinder of all members is impracticable." Fed. R. Civ. P. 23(a)(1).
24 "[I]mpracticability' does not mean 'impossibility'"—only that joining all class members would
25 be difficult or inconvenient. *Johnson v. City of Grants Pass*, 50 F.4th 787, 803 (9th Cir. 2022)
26 (quoting *Harris v. Palm Springs Alpine Ests., Inc.*, 329 F.2d 909, 913-14 (9th Cir. 1964)).
27 Although there is no fixed number that renders joinder impracticable, courts have found the
28 "numerosity requirement satisfied when a class includes at least 40 members." *Rannis v. Recchia*,

1 380 F. App'x 646, 651 (9th Cir. 2010). *See also Ambrosia v. Cogent Commc'ns, Inc.*, 312 F.R.D.
2 544, 552 (N.D. Cal. 2016) (“as a general matter, a class greater than forty often satisfies the
3 requirement”). Where the precise class size is unknown, but “general knowledge and common
4 sense indicate that it is large, the numerosity requirement is satisfied.” *Kidd v. Mayorkas*, 343
5 F.R.D. 428, 437 (C.D. Cal. 2023) (quoting *Orantes-Hernandez v. Smith*, 541 F. Supp. 351, 370
6 (C.D. Cal. 1982)). Additionally, where declaratory or injunctive relief is sought, “plaintiffs may
7 rely on [] reasonable inference[s] arising from plaintiffs’ other evidence that the number of
8 unknown and future members” renders joinder impracticable. *C.R. Educ. & Enf’t Ctr. v. Hosp.*
9 *Props. Tr.*, 317 F.R.D. 91, 100 (N.D. Cal. 2016) (alterations in original) (internal quotation marks
10 omitted) (citing *Sueoka v. United States*, 101 F. App'x 649, 653 (9th Cir. 2004)).

11 Here, the proposed Suspicionless Stop Class plainly is large enough to make joinder
12 impracticable. Since the beginning of June 2025, Defendants have carried out numerous
13 suspicionless stops across Southern California based on broad and impermissible profiles.
14 Plaintiffs’ eyewitness declarations detail over two dozen such incidents alone. ECF 45-1 to ECF
15 45-17; ECF 45-21; ECF 81-2; ECF 128-2 to ECF 128-12. This does not include additional
16 incidents captured in videos or reported in news articles cited in Plaintiffs’ papers. ECF 45 at 2-6,
17 9-11, 15; ECF 81 at 6; ECF 128 at 2-3. Moreover, available data suggests that the total number of
18 suspicionless stops conducted to date is much higher. According to ICE statistics obtained by the
19 Data Deportation Project, the number of street arrests (not even stops) in the Los Angeles Area of
20 Responsibility (AOR) covering the seven counties of the District reached hundreds per week in
21 June. Ex. 15, Declaration of Graeme Blair (“Blair Decl.”) ¶¶ 6-7 & Figure 1 (depicting “Non-
22 Custodial Arrests,” which ICE describes as a category reflecting “street arrests with an appropriate
23 landmark”²). Between June 6 and June 22, DHS apparently arrested 1,618 people within the
24
25
26

27 ² [https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/cap_ice_4-15-](https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/cap_ice_4-15-14_0.pdf)
28 [14_0.pdf](https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/cap_ice_4-15-14_0.pdf) at 44.

District.³

Additional factors further support a finding of impracticability: class members are geographically dispersed across seven Southern California counties; many have limited financial means and face barriers to bringing individual suits; and judicial economy weighs in favor of class treatment. *See* 1 William B. Rubenstein, *Newberg and Rubenstein on Class Actions* § 3:12 (6th ed.). The proposed class also includes numerous unnamed future members who are likely to be subjected to the same unlawful practices. The inclusion of unknown or future members strongly favors a finding of impracticability. *See Doe v. Wolf*, 424 F. Supp. 3d 1028, 1040 (S.D. Cal. 2020) (“[W]here the class includes unnamed, unknown future members, joinder of such unknown individuals is impracticable and the numerosity requirement is therefore met, regardless of class size.”) (citation omitted); *Ali v. Ashcroft*, 213 F.R.D. 390, 408-09 (W.D. Wash. 2003) (same). When a “class’s membership changes continually over time, that factor weighs in favor of concluding that joinder of all members is impracticable.” *A.B. v. Hawaii St. Dep’t of Educ.*, 30 F.4th 828, 838 (9th Cir. 2022); *see also J.D. v. Azar*, 925 F.3d 1291, 1322 (D.C. Cir. 2019) (“classes including future claimants generally meet the numerosity requirement due to the impracticability of counting such members, much less joining them.”) (internal quotation marks omitted); *cf. Orantes-Hernandez*, 541 F. Supp. at 370.

Accordingly, Plaintiffs satisfy the numerosity requirement of Rule 23(a)(1).

2. The Suspicionless Stop Class Shares Common Questions of Law or Fact

This case presents “questions of law or fact common to the class.” Fed. R. Civ. P. 23(a)(2). *See supra* at 3-7; *see also Vasquez Perdomo v. Noem*, --- F.4th ---, 2025 WL 2181709, at *3-*7 (discussing record evidence of Defendants’ pattern of roving patrols and harms to plaintiffs).

“The commonality requirement is ‘construed permissively.’” *Rodriguez v. Bostock*, 349 F.R.D. 333, 353 (W.D. Wash. 2025) (quoting *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1019 (9th Cir. 1998)); *see Ellis v. Costco Wholesale Corp.*, 657 F.3d 970, 981 (9th Cir. 2011) (emphasizing

³ <https://www.bellingcat.com/news/2025/07/08/masked-armed-and-forceful-finding-patterns-in-los-angeles-immigration-raids/> (also referencing videos of over 100 incidents depicting “what appear to be recurring trends and tactics used by officers”).

1 the permissive construction of Rule 23(a)(2)). A “single common issue of law or fact is sufficient
2 to satisfy the commonality requirement.” *Perez-Olano v. Gonzalez*, 248 F.R.D. 248, 257 (C.D.
3 Cal. 2008)); *see also, e.g., Rodriguez v. Hayes*, 591 F.3d 1105, 1122 (9th Cir. 2010) (“[T]he
4 commonality requirements asks us to look only for some shared legal issue or a common core of
5 facts”). Plaintiffs’ claims “must depend upon a common contention,” and that contention must be
6 “capable of classwide resolution”—meaning that “determination of its truth or falsity will resolve
7 an issue that is central to the validity of each one of the claims in one stroke.” *Wal-Mart Stores*,
8 564 U.S. at 350.

9 Further, “[a]ll questions of fact and law need not be common to satisfy the commonality
10 requirement. The existence of shared legal issues with divergent factual predicates is sufficient.”
11 *Gonzalez*, 975 F.3d at 807 (internal quotation marks and alterations omitted). “Thus, ‘[w]here the
12 circumstances of each particular class member vary but retain a common core of factual or legal
13 issues with the rest of the class, commonality exists.’” *Parsons*, 754 F.3d at 675. The critical issue
14 for class certification thus “is not the raising of common ‘questions’ . . . but, rather the capacity of
15 a classwide proceeding to generate common *answers* apt to drive the resolution of the litigation.”
16 *Id.* (citation omitted).

17 This standard is readily met where, as here, plaintiffs seek prospective relief “challeng[ing]
18 a system-wide practice or policy that affects all of the putative class members.” *Armstrong v.*
19 *Davis*, 275 F.3d 849, 868 (9th Cir. 2001), *abrogated on other grounds by Johnson v. California*,
20 543 U.S. 499, 504–05 (2005); *see also* 7A Wright, Miller & Kane, Fed. Practice & Proc. Civ. §
21 1763 (4th ed. 2025) (“[C]lass suits for injunctive or declaratory relief by their very nature often
22 present common questions satisfying Rule 23(a)(2).”); *see also Cruz v. MM 879, Inc.*, 329 F.R.D.
23 639, 645–46 (E.D. Cal. 2019) (finding commonality requirement satisfied where Plaintiffs
24 challenged compensation scheme and meal break policy); *Doe #1 v. Trump*, 335 F.R.D. at 433–34
25 (finding commonality requirement satisfied “in cases involving challenges to systemic
26 immigration policies and procedures, even though immigration decisions ultimately involve
27 discretionary decisions by consular officers”); *Ms. L*, 331 F.R.D. at 539 (finding commonality
28 requirement satisfied where plaintiffs challenged government’s “practice of separating migrant

1 parents and children and keep them separate without a showing the parent is unfit”); *Ortega-*
2 *Melendres*, 836 F.Supp.2d at 989 (finding commonality requirement satisfied where plaintiffs
3 challenged government racial-profiling policy and practice for conducting vehicle stops). In
4 particular, the Ninth Circuit has held that “Fourth Amendment claims concerning government
5 policies, practices or procedures for probable cause determinations are plainly suitable for
6 classwide resolution.” *Gonzalez*, 975 F.3d at 809. This logic applies with equal force to reasonable
7 suspicion determinations under the Fourth Amendment.

8 The proposed class satisfies the commonality requirement here because all class members
9 are subject to the same challenged practice, namely, Defendants’ practice of conducting detentive
10 stops without an individualized assessment of reasonable suspicion, and the challenged practice in
11 turn infringes on putative class members’ constitutional rights in substantially similar ways. *See*
12 ECF 128 at 4, 12. “Commonality requires plaintiff to demonstrate that her claims ‘depend upon a
13 common contention ... [whose] truth or falsity will resolve an issue that is central to the validity of
14 each one of the claims in one stroke.’” *Spann v. J.C. Penney Corp.*, 307 F.R.D. 508, 517 (C.D.
15 Cal. 2015), *modified*, 314 F.R.D. 312 (C.D. Cal. 2016) (quoting *Wal-Mart Stores*, 564 U.S. at
16 350). Common questions of law and fact present here include:

- 17 • Whether Defendants have a policy, pattern or practice of conducting detentive stops
18 without pre-stop reasonable suspicion, particularized to the person, that an individual
19 (1) is engaged in an offense against the United States or (2) is a noncitizen unlawfully
20 present in the United States;
- 21 • Whether Defendants have a policy, pattern or practice of conducting stops using broad
22 profiles based on apparent race or ethnicity, speaking Spanish or speaking English with
23 an accent, location, and occupation, alone or in combination;
- 24 • Whether Defendants’ policy, pattern or practice of conducting stops without pre-stop
25 reasonable suspicion, particularized to the person, that an individual (1) is engaged in
26 an offense against the United States or (2) is a noncitizen unlawfully in the United
27 States violates the Fourth Amendment; and
- 28 • Whether Defendants’ policy, pattern, or practice of conducting stops using broad

1 profiles based on apparent race or ethnicity, speaking Spanish or speaking English with
2 an accent, location, and occupation, alone or in combination, violates the Fourth
3 Amendment.

4 That class members' individual experiences may have varying circumstances does not
5 defeat the commonality among them, because the core common questions presented do not
6 necessitate a substantial individual inquiry that would prevent a "classwide resolution." *Wal-Mart*,
7 564 U.S. at 350; *see also, e.g., Evon v. Law Offices of Sidney Mickell*, 688 F.3d 1015, 1029 (9th
8 Cir. 2012) ("Where the circumstances of each particular class member vary but retain a common
9 core of factual or legal issues with the rest of the class, commonality exists." (citation omitted));
10 *Walters v. Reno*, 145 F.3d 1032, 1046 (9th Cir. 1998) (finding commonality based on plaintiffs'
11 common challenge to INS procedures, and noting that "[d]ifferences among the class members
12 with respect to the merits of their actual document fraud cases . . . are simply insufficient to defeat
13 the propriety of class certification"); *Orantes-Hernandez*, 541 F. Supp. at 370 (certifying a class in
14 challenge to common government practices in asylum cases, even though the outcome of
15 individual asylum cases would depend on individual class members' varying entitlement to relief).

16 Plaintiffs satisfy the commonality requirement of Rule 23(a)(2).

17 **3. *The Named Plaintiffs' Claims are Typical of the Suspicionless Stop Class***
18 ***Members***

19 The proposed representative parties—four Individual Plaintiffs and three Organizational
20 Plaintiffs—meet the Rule 23(a)(3) requirement that their claims be "typical of the claims . . . of the
21 class." Fed. R. Civ. P. 23(a)(3). "Under the rule's permissive standards, representative claims are
22 'typical' if they are reasonably coextensive with those of absent class members; they need not be
23 substantially identical." *Parsons*, 754 F.3d at 685 (the test for typicality is "whether other
24 members have the same or similar injury, whether the action is based on conduct which is not
25 unique to the named plaintiffs, and whether other class members have been injured by the same
26 course of conduct.") (citations omitted). The inquiry "'focuses on the *nature of the claim*'" the
27 proposed class representative brings, and not "'the specific facts from which it arose.'" *Gonzalez*,
28 975 F.3d at 809; *see, e.g., Armstrong*, 275 F.3d at 868 (typicality is "'satisfied when each class

1 member's claim arises from the same course of events, and each class member makes similar legal
2 arguments to prove the defendant's liability.'").

3 As an initial matter, the Organizational Plaintiffs may serve as class representatives
4 because each has associational standing to bring claims on behalf of its members, many of whom
5 are putative class members who stand to be harmed by the challenged practices absent judicial
6 intervention. *See supra* at 5-7, 9. "[M]any courts have held that organizations with associational
7 standing may serve as class representatives." *Vietnam Veterans of Am. v. C.I.A.*, 288 F.R.D. 192,
8 204-07 & n.6 (N.D. Cal. 2012) (citations omitted) ("[T]he VVA has associational standing to
9 represent the class, as long as some of its members would otherwise have standing to sue in their
10 own right," which at least three did); *Cal. Rural Legal Assistance, Inc. v. Legal Servs. Corp.*, 917
11 F.2d 1171, 1174-75 (9th Cir. 1990) (rejecting challenge to typicality because "in their
12 associational capacity, the unions are acting on behalf of" members, which included putative class
13 members). This is no different for cases raising claims under the Fourth Amendment. *See Kidd,*
14 343 F.R.D. at 443 (appointing Coalition Plaintiffs as class representatives in case challenging
15 home arrest practices). And Organizational Plaintiffs may represent a class that comprises both
16 members and non-members. *See One Unnamed Deputy Dist. Att'y v. Cnty. of Los Angeles*, No.
17 CV 09-7931 ODW (SSx), 2011 WL 13128375, at *1 (C.D. Cal. Jan. 24, 2011) (unions may
18 represent class that includes non-union members); *Cal. Rural Legal Assistance*, 917 F.2d at 1175
19 (same).

20 Both the Individual and Organizational Plaintiffs' claims are typical of those of the
21 proposed class here. The purpose of the typicality requirement "is to assure that the interest of the
22 named representative aligns with the interests of the class." *Wolin v. Jaguar Land Rover N. Am.,*
23 *LLC*, 617 F.3d 1168, 1175 (9th Cir. 2010) (citing *Hanon v. Dataproducts Corp.*, 976 F.2d 497,
24 508 (9th Cir. 1992)). Like commonality, the typicality requirement "is permissive and requires
25 nothing more than that a class plaintiff's claims be reasonably coextensive with those of absent
26 class members." *Gonzalez* at 809 (internal quotation marks omitted). Typicality "is not primarily
27 concerned with whether each person in a proposed class suffers the same type of damages; rather,
28 it is sufficient for typicality if the plaintiff endured a course of conduct directed against the class."

1 *Just Film, Inc. v. Buono*, 847 F.3d 1108, 1118 (9th Cir. 2017). Each Individual Plaintiff and the
2 members of Organizational Plaintiffs have been and/or are at imminent risk of being subjected to
3 the same unlawful policy and practice of suspicionless detentive stops that is challenged by the
4 putative class in this case. *See supra* at 4-7.

5 Plaintiffs have demonstrated that they are suffering and likely to suffer from the same legal
6 injury as the members of the proposed class. *See Parsons*, 754 F.3d at 678; *Rodriguez*, 349 F.R.D.
7 at 351; *United Farm Workers*, 2025 WL 1235525, *38-*39 (finding typicality, despite
8 Defendants’ assertions that individualized determinations were necessary, and explaining that
9 “Plaintiffs are not asserting Border Patrol made *incorrect* reasonable suspicion findings
10 Plaintiffs are asserting that Border Patrol agents *did not make* [individualized] reasonable
11 suspicion determinations related to detentive stops[.]”) (additional emphasis added). Plaintiffs’
12 claims are typical because they challenge the same system-wide course of conduct and seek the
13 same form of relief—declaratory and injunctive relief—to stop the same future harm of unlawful
14 stops. Plaintiffs therefore satisfy this requirement of Rule 23(a).

15 **4. The Proposed Class Representatives and Class Counsel Will Fairly and**
16 **Adequately Protect the Interests of the Class**

17 Under Rule 23(a)(4), the Court must be satisfied the “representative parties will fairly and
18 adequately protect the interests of the class.” Fed. R. Civ. P. 23(a)(4). This determination turns on
19 two questions: “(1) do the named plaintiffs and their counsel have any conflicts of interest with
20 other class members[,] and (2) will the named plaintiffs and their counsel prosecute the action
21 vigorously on behalf of the class?” *Evon*, 688 F.3d at 1031. This adequacy requirement “‘tend[s]
22 to merge’ with the commonality and typicality criteria of Rule 23(a).” *Amchem Prods., Inc. v.*
23 *Windsor*, 521 U.S. 591, 626 n.20 (1997) (alteration in original); *see Gen. Tel. Co. of Sw. v. Falcon*,
24 457 U.S. 147, 157 n.13 (1982) (explaining commonality and typicality “serve as guideposts” to
25 ensure “the named plaintiff’s claim and the class claims are so interrelated that the interests of the
26 class members will be fairly and adequately protected in their absence”).

27 **Named Plaintiffs:** The proposed class representatives satisfy the adequacy requirement
28 because their interests align with, and are not adverse to, the interests of the class. The Individual

1 Plaintiffs are motivated to pursue this action on behalf of others like themselves—or, in the case of
2 Organizational Plaintiffs, on behalf of their members—who have been, will be, or reasonably fear
3 being subjected to suspicionless stops under the same unlawful pattern or practice. *See* Third
4 Vasquez Perdomo Decl. ¶ 16; Third Villegas Molina Decl. ¶ 15; Second Hernandez Viramontes
5 Decl. ¶ 5; Second Gavidia Decl. ¶ 3; Second Gudino Decl. ¶¶ 13-14; Third Strater Decl. ¶ 39;
6 Third Salas Decl. ¶¶ 2-3; *see also supra* at 5-7 (discussing why the Organizational Plaintiffs will
7 be adequate class representatives). Plaintiffs seek declaratory and injunctive relief against the
8 government’s policies. As a result, there is no potential conflict between the interests of Plaintiffs
9 and members of the proposed class. *See Rodriguez*, 349 F.R.D. at 362 (no conflict of interest
10 where class representative “has a ‘mutual goal’ with the other class members to challenge the
11 allegedly unlawful practices and to ‘obtain declaratory . . . relief that would not only cure this
12 illegality but remedy the injury suffered by all current and future class member’” (quoting
13 *Nightingale v. U.S. Citizenship & Immigr. Servs.*, 333 F.R.D. 449, 462 (N.D. Cal. 2019)).

14 Accordingly, Plaintiffs are adequate representatives of the proposed Suspicionless Stop Class.

15 ***Class Counsel:*** Plaintiffs’ counsel also meet the adequacy requirement. Counsel are
16 qualified when they can establish experience in previous class actions and cases involving the
17 same area of law. *See Lynch v. Rank*, 604 F. Supp. 30, 37 (N.D. Cal. 1984), *aff’d*, 747 F.2d 528
18 (9th Cir. 1984), *amended on reh’g*, 763 F.2d 1098 (9th Cir. 1985). Plaintiffs are represented by
19 experienced attorneys from the ACLU Foundations of Southern California, Northern California,
20 and San Diego and Imperial Counties; the University of California, Irvine School of Law
21 Immigrant and Racial Justice Solidarity Clinic; Munger, Tolles & Olson LLP; the National Day
22 Laborer Organizing Network; Law Offices of Stacy Tolchin; and Public Counsel. Counsel have
23 deep knowledge of immigration law and extensive experience litigating class actions protecting
24 the constitutional and statutory rights of immigrants, as well as in other complex federal cases.
25 Counsel also have the necessary resources, expertise, and commitment to adequately prosecute
26 this case on behalf of Plaintiffs and the proposed Suspicionless Stop Class. Plaintiffs’ counsel
27 have demonstrated their commitment and capability by zealously and vigorously representing
28 Plaintiffs’ interests thus far in the proceedings, including through extensive factual investigation

1 and litigation before this Court and the Ninth Circuit. Proposed class counsel have identified no
2 conflict of interest with any Plaintiff or any identified member of the Proposed Class. *See*
3 *generally* Ex. 1, Declaration of Jacob Kreilkamp (MTO); Ex. 2, Declaration of Eva Bitran
4 (ACLU); Ex. 3, Declaration of Anne Lai (UCI); Ex. 4, Declaration of Stacy Tolchin (Law Offices
5 of Stacy Tolchin); Ex. 5, Declaration of Jessica Karp Bansal (NDLON); Ex. 6, Declaration of
6 Rebecca Brown (Public Counsel). Therefore, class counsel meet the adequacy requirements set
7 forth in both Rules 23(a)(4) and 23(g), and are qualified to serve as class counsel in this case.

8 **D. The Proposed Class Meets the Requirements of Rule 23(b)(2)**

9 In addition to satisfying the requirements of Rule 23(a), the Proposed Class meets the
10 requirements of Rule 23(b)(2). “[T]he primary role of [Rule 23(b)(2)] has always been the
11 certification of civil rights class actions.” *Parsons*, 754 F.3d at 686 (quoting *Amchem Prods., Inc.*,
12 521 U.S. at 614). Under Rule 23(b)(2), class certification is warranted when the opposing party
13 “has acted or refused to act on grounds that apply generally to the class, so that final injunctive
14 relief or corresponding declaratory relief is appropriate respecting the class as a whole.” Fed. R.
15 Civ. P. 23(b)(2).

16 “The key to [a] (b)(2) class is ‘the indivisible nature of the injunctive or declaratory
17 remedy warranted—the notion that the conduct is such that it can be enjoined or declared unlawful
18 only as to all of the class members or as to none of them.’” *Wal-Mart Stores*, 564 U.S. at 360. This
19 standard is “unquestionably satisfied when members of a putative class seek uniform injunctive or
20 declaratory relief from policies or practices that are generally applicable to the class as a whole,”
21 even where the class seeks to ultimately challenge more than one policy or practice. *See Parsons*,
22 754 F.3d at 667-68, 688-89 (discussing (b)(2) class that challenged 15 discrete policies or
23 practices of state prison system, seeking “uniform changes in statewide ADC policy and
24 practice”); *see also Melendres v. Arpaio*, 784 F.3d 1254, 1258-59 (9th Cir. 2015) (injunction in
25 (b)(2) class case addressing multiple aspects of sheriff’s office policy and practice).

26 This is a quintessential case for Rule 23(b)(2) treatment. The proposed suspicionless stop
27 class seeks to challenge the federal government’s policy and practice of conducting detentive stops
28 without an individualized assessment of reasonable suspicion. This policy and practice applies to

1 all members of proposed class. Accordingly, a “single injunctive or declaratory judgment”—
2 establishing that Defendants’ pattern or practice of suspicionless stops violates the Fourth
3 Amendment—“would provide relief to each member of the class.” *Wal-Mart*, 564 U.S. at 360; *see*
4 *also Amchem Prods.*, 521 U.S. at 614 (explaining that “[c]ivil rights cases against parties charged
5 with unlawful, class-based discrimination are prime examples” of 23(b)(2) class actions). Federal
6 courts have routinely certified classes in similar cases. *See, e.g., Walters*, 145 F.3d at 1047
7 (upholding certification under Rule 23(b)(2) where plaintiffs sought injunctive relief against INS
8 practices in document fraud proceedings); *Ortega-Melendres*, 836 F. Supp. 2d at 990–91 (finding
9 certification under Rule 23(b)(2) proper where plaintiffs sought injunctive and declaratory relief
10 against sheriff’s vehicle stop practices, including on Fourth Amendment grounds); *see also supra*
11 *at 2*.

12 As with the commonality requirement under Rule 23(a), that individual class members
13 may be affected by Defendants’ practices in different ways does not undermine the case for (b)(2)
14 class treatment. There is no predominance requirement under Rule 23(b)(2); the rule “asks only
15 whether ‘the party opposing the class has acted or refused to act on grounds that apply generally to
16 the class.’” *Parsons*, 754 F.3d at 689. As such, certification under Rule 23(b)(2) is proper even
17 where “each of the certified . . . policies and practices may not affect every member of the
18 proposed class . . . in exactly the same way” so long as the defendant acted on grounds that
19 “appli[ed] generally to the proposed class.” *Id.* (systemic policies and practices placed “every
20 inmate in [Arizona Department of Corrections] custody in peril” and defendants’ deliberate
21 indifference to the “resulting risk of serious harm” applied generally to the proposed class); *see*
22 *also Gibson v. Local 40, Supercargoes and Checkers*, 543 F.2d 1259, 1264 (9th Cir. 1976) (“A
23 class action may be maintained under [Rule] 23(b)(2), alleging a general course of racial
24 discrimination by an employer or union, though the discrimination may have been manifested in a
25 variety of practices affecting different members of the class indifferent ways . . .”). “It is
26 sufficient if class members complain of a pattern or practice that is generally applicable to the
27 class as a whole.” *Walters*, 145 F.3d at 1047.

28 Class members here seek class-wide relief from Defendants’ policy and practice. That is

sufficient for this civil rights action. *Parsons*, 754 F.3d at 686; Advisory Committee's Note to Subdivision (b)(2), 39 F.R.D. 102 (1996) ("Illustrative [of the purpose of Rule 23(b)(2)] are" civil rights actions, usually those "whose members are incapable of specific enumeration.").

V. CONCLUSION

The Court should certify the proposed Suspicionless Stop Class under Federal Rules of Civil Procedure 23(a) and 23(b)(2). Additionally, Plaintiffs request that the Court appoint the Stop/Arrest Plaintiffs' counsel as class counsel pursuant to Rule 23(g).

Dated: August 7, 2025

Respectfully submitted,

ACLU FOUNDATION OF
SOUTHERN CALIFORNIA

By: /s/ Stephanie Padilla
Stephanie Padilla

Counsel for Stop/Arrest Plaintiffs

UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC

By: /s/ Anne Lai
Anne Lai

Counsel for Stop/Arrest Plaintiffs

MUNGER, TOLLES & OLSON LLP

By: /s/ Jacob S. Kreilkamp
Jacob S. Kreilkamp

Counsel for Stop/Arrest Plaintiffs

ATTESTATION

Pursuant to L-R 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content.

Dated: August 7, 2025

/s/ Stephanie Padilla
Stephanie Padilla

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2025, I electronically filed the foregoing with the Clerk of the U.S. District Court for the Central District of California using the CM/ECF system, which provided notification of such filing to all registered CM/ECF users

Dated: August 7, 2025

ACLU FOUNDATION OF
SOUTHERN CALIFORNIA

By: /s/ Stephanie Padilla
Stephanie Padilla

Counsel for Stop/Arrest Plaintiffs

CERTIFICATE OF COMPLIANCE

The undersigned counsel of record certifies that this filing is 12-point font and twenty pages, which complies with this Court's standing order.

Dated: August 7, 2025

ACLU FOUNDATION OF
SOUTHERN CALIFORNIA

By: /s/ Stephanie Padilla
Stephanie Padilla

Counsel for Stop/Arrest Plaintiffs

EXHIBIT 1

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JACOB S.
KREILKAMP IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

- 1 JACOB S. KREILKAMP (SBN 248210)
2 jacob.kreilkamp@mto.com
3 JAMIE LUMA (SBN 331610)
4 jamie.luma@mto.com
5 SARA H. WORTH (SBN 341088)
6 sara.worth@mto.com
7 HENRY D. SHREFFLER (SBN 343388)
8 henry.shreffler@mto.com
9 MAGGIE BUSHELL (SBN 354048)
10 maggie.bushell@mto.com
11 KYLE A. GROVES (SBN 358085)
12 kyle.groves@mto.com
13 MUNGER, TOLLES & OLSON LLP
14 350 S. Grand Ave., 50th Floor
15 Los Angeles, CA 90071
16 Tel: 213-683-9100; Fax: 213-683-9100
17 *Counsel for Stop/Arrest Plaintiffs*
- 18 JESSICA K. BANSAL (SBN 277347)
19 jessica@ndlon.org
20 LAUREN MICHEL WILFONG*
21 lwilfong@ndlon.org
22 NATIONAL DAY LABORER
23 ORGANIZING NETWORK
24 1030 S. Arroyo Parkway, Suite 106
25 Pasadena, CA 91105
26 Tel: 626-214-5689
27 *Counsel for Stop/Arrest Plaintiffs*
- 28 BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493
Counsel for Stop/Arrest Plaintiffs
- BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199
Counsel for Stop/Arrest Plaintiffs
- MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883
Counsel for Access/Conditions Plaintiffs
- EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174
Counsel for Plaintiff United Farm Workers
- CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025
*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*
- ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999
*Counsel for Plaintiff Immigrant
Defenders Law Center*
- * Admitted pro hac vice

DECLARATION OF JACOB KREILKAMP

I, Jacob Kreilkamp, declare as follows:

1. I am an attorney licensed to practice in the State of California, and I am a partner at Munger, Tolles & Olson LLP (“MTO”), counsel of record for Plaintiffs Pedro Vasquez Perdomo, Carlos Alexander Osorto, Isaac Villegas Molina, Jorge Hernandez Viramontes, Jason Brian Gavidia, Los Angeles Worker Center Network (“LAWCN”), United Farm Workers (“UFW”) and Coalition for Humane Immigrant Rights (“CHIRLA”, and together with LAWCN and UFW, the “Plaintiff Coalitions”) in the above-entitled action. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would testify competently to the matters set forth herein. I submit this declaration in support of Plaintiff Coalitions’ motion for class certification and appointment of the American Civil Liberties Union Foundation of Southern California (“ACLU of Southern California”), the American Civil Liberties Union Foundation of Northern California (“ACLU of Northern California”), the American Civil Liberties Union Foundation of San Diego and Imperial Counties (“ACLU of San Diego”), the UC Irvine School of Law Immigrant Rights Clinic, the Law Offices of Stacy Tolchin, the National Day Laborer Organizing Network (“NDLON”), Public Counsel, and MTO (collectively, “Plaintiffs’ Counsel”) as class counsel.

2. In appointing class counsel, the Court must consider “the work counsel has done in identifying or investigating potential claims in the action,” “counsel’s experience in handling class actions, other complex litigation, and the types of claims asserted in the action,” “counsel’s knowledge of the applicable law,” and “the resources that counsel will commit to representing the class.” Fed. R. Civ. P. 23(g)(1)(A). As set forth herein, Plaintiffs’ Counsel satisfy this standard.

3. MTO serves as counsel for Plaintiffs, along with counsel from the ACLU of Southern California, the ACLU of Northern California, the ACLU of San Diego, the UC Irvine School of Law Immigrant Rights Clinic, the Law Offices of

1 Stacy Tolchin, NDLO, and Public Counsel.¹ Sara Worth, Jamie Luma, Henry
2 Shreffler, Maggie Bushell, Kyle Groves, and I are the MTO attorneys primarily
3 responsible for and involved in this litigation before the District Court.

4 4. I have been a member of the California bar since 2007. I graduated
5 *magna cum laude* from New York University School of Law in 2003, where I was
6 elected to the Order of the Coif and received the Butler Graduation Award for
7 Outstanding Scholarship, Professional Activities and Character, and the Lipper
8 Graduation Award for Outstanding Scholarship in the Field of International Law.
9 After graduation, I clerked for the Honorable Kimba M. Wood in the United States
10 District Court for the Southern District of New York from 2003 to 2004, and for the
11 Honorable Raymond C. Fisher in the United States Court of Appeals for the Ninth
12 Circuit from 2004 to 2005.

13 5. I joined MTO in 2006. My practice has focused on complex
14 commercial litigation and civil rights *pro bono* litigation. My significant litigation
15 experience relevant to this motion includes: representing (along with my colleague,
16 Kyle Groves) a class of individuals pursuing claims against the federal government
17 arising out of warrantless civil immigration enforcement operations used by
18 immigration agents in *Kidd v. Noem*, No. 2:20-cv-3512-ODW-JPR (C.D. Cal.);
19 representing a proposed class of individuals pursuing claims against the federal
20 government for delays in their naturalization proceedings; serving as co-counsel for
21 *amici* in *Ortiz Becerra v. Barr*, Case No. 17-70859 (9th Cir. 2019) (legality of ICE
22 home enforcement practices); serving as counsel for the plaintiffs in class actions
23 against local governmental entities in Southern California bringing due process
24 challenges to gang injunction enforcements practices; serving as counsel for plaintiffs

25
26 ¹ Declarations from attorneys for the ACLU of Southern California, the ACLU of
27 Northern California, the ACLU of San Diego, the UC Irvine School of Law
28 Immigrant Rights Clinic, the Law Offices of Stacy Tolchin, NDLO, and Public
Counsel are filed concurrently herewith.

1 in numerous state and federal court actions bringing constitutional challenges to
2 prison conditions during the COVID-19 pandemic; defending putative securities class
3 action claims; representing the United Nations' Special Rapporteur on the promotion
4 of the right to freedom of opinion and expression in proceedings in various African
5 regional courts challenging restrictive press laws; working as co-counsel with the
6 ACLU of Southern California on other projects relating to prisoners' rights; and
7 drafting amicus briefs relating to a range of civil liberties issues on behalf of various
8 individuals and organizations, including law professors and members of Congress. In
9 addition to my litigation practice, I am a member of the Board of Directors of the
10 ACLU of Southern California; a member of the Board of Directors of the Inner City
11 Law Center; and a member of the Homeboy Industries Legal Support Counsel.

12 6. My colleague Sara H. Worth has been a member of the California bar
13 since 2021. She graduated from Yale Law School in 2021. After law school, Ms.
14 Worth joined MTO in 2022 before clerking for the Honorable James Donato of the
15 U.S. District Court for the Northern District of California in 2023-24. Ms. Worth
16 then re-joined MTO in 2025 after serving as an election safeguarding attorney for
17 the ACLU Voting Rights Project.

18 7. Ms. Worth's practice focuses on commercial litigation in state and
19 federal courts. Ms. Worth also maintains an active pro bono practice focused on
20 constitutional rights, including serving as plaintiffs' counsel alongside the ACLU of
21 Northern California and others in *Asian Prisoner Support Committee v. California*
22 *Department of Corrections and Rehabilitation* (Sup. Ct. Alameda, Case No. 23-cv-
23 031986), a case that challenges CDCR's policy of referring of California inmates to
24 ICE for possible deportation solely because of their place of birth, in violation of
25 California's Constitution and California law.

26 8. My colleague Jamie B. Luma, Ph.D., has been a member of the
27 California bar since 2020. She graduated from the University of Chicago Law
28 School in 2019 with high honors, where she was elected to the Order of the Coif and

1 a Kirkland and Ellis Scholar. Ms. Luma also received her Ph.D. in social
2 psychology from Yale University. After law school, Ms. Luma clerked for the
3 Honorable Brenda K. Sannes of the U.S. District Court for the Northern District of
4 New York in 2019-2020 and then later clerked for the Honorable Amy J. St. Eve of
5 the U.S. Court of Appeals for the Seventh Circuit in 2020-2021.

6 9. Ms. Luma joined MTO in 2021. During her time at MTO, Ms. Luma's
7 practice has focused on litigation, particularly involving clients in the technology
8 industry in complex and high-stakes multidistrict litigation. Her practice focuses on
9 antitrust and technology issues. Ms. Luma has represented clients at all stages of
10 proceedings, from pre-litigation counseling and internal investigations through trial.
11 Ms. Luma has also written dispositive briefs, worked with expert witnesses, and
12 managed all aspects of discovery. Ms. Luma also maintains an active pro bono
13 practice, including representing individual clients in removal proceedings before the
14 Executive Office for Immigration Review and in visa proceedings before U.S.C.I.S.

15 10. My colleague Henry D. Shreffler has been a member of the California
16 bar since 2022. He graduated from UCLA School of Law in 2021, where he was
17 elected to the Order of the Coif, was awarded the Masin Family Academic
18 Excellence Gold Award in three classes, and a member of the Moot Court Honors
19 Program. During law school, Mr. Shreffler also served as a senior editor of the
20 UCLA Law Review and externed with the California Department of Justice. After
21 law school, Mr. Shreffler clerked for the Honorable G. Murray Snow of the U.S.
22 District Court for the District of Arizona in 2021-2022 and then later clerked for the
23 Honorable David M. Ebel of the U.S. Court of Appeals for the Tenth Circuit in
24 2022-2023.

25 11. Mr. Shreffler joined MTO in 2023. His practice focuses on litigation
26 and investigations. He represents public companies and their officers in securities
27 and derivative litigation, as well as associated governmental investigations, as well
28 as employers in employment litigation. He has represented clients in both state and

1 federal courts at both the trial and appellate level, including in a successful petition
2 for review before the California Supreme Court. Mr. Shreffler also maintains an
3 active pro bono practice, including representing a family in removal proceedings
4 before the Executive Office for Immigration Review and in related visa proceedings
5 before U.S.C.I.S.

6 12. My colleague Kyle A. Groves has been a member of the California bar
7 since 2024. He graduated from UCLA School of Law in 2024, where he was
8 elected to the Order of the Coif, received the Masin Family Academic Excellence
9 Gold Award, and was a Michael T. Masin Scholar. During law school, Mr. Groves
10 also served as an associate editor of the UCLA Law Review, and won UCLA's 2023
11 Roscoe Pound Moot Court Competition.

12 13. Mr. Groves joined MTO in 2024. He focuses his practice on
13 commercial litigation and investigations in state and federal courts at both the trial
14 and appellate levels. Mr. Groves also maintains an active pro bono practice,
15 including serving with me as counsel for plaintiffs in *Kidd v. Noem*, No. 2:20-cv-
16 3512-ODW-JPR (C.D. Cal.) (legality of ICE knock-and-talks and ruses).

17 14. My colleague Maggie J. Bushell has been a member of the California
18 bar since 2023. She graduated from the University of Chicago Law School in 2023
19 with honors. In law school, Ms. Bushell was co-president of the Immigration Law
20 Society and a board member of the American Constitution Society. Ms. Bushell
21 also served as a research assistant to various professors and conducted research on
22 bilateral labor agreements and school finance litigation. After law school, Ms.
23 Bushell clerked for the Honorable Richard A. Paez of the U.S. Court of Appeals for
24 the Ninth Circuit in 2023-2024.

25 15. Ms. Bushell joined MTO in 2024. She represents clients in commercial
26 litigation in both state and federal courts. Ms. Bushell primarily represents media
27 and technology companies. Ms. Bushell also has an active pro bono practice,
28 including on First Amendment issues. She also currently represents individual

1 immigrant clients in several cases before the Executive Office for Immigration
2 Review.

3 16. I am not aware of any conflict among potential class members in this
4 case.

5 17. I am not aware of any conflict between MTO and any members of the
6 potential class that would prevent MTO from representing the class.

7 I declare under penalty of perjury of the laws of the State of California and
8 the United States that the foregoing is true and correct to the best of my knowledge
9 and belief.

10 Executed this 7th day of August 2025 in Los Angeles, California.

11
12 Bv: /s/ Jacob Kreilkamp
13 Jacob Kreilkamp
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 2

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 Pedro VASQUEZ PERDOMO; Carlos
20 Alexander OSORTO; and Isaac
21 VILLEGAS MOLINA; Jorge
22 HERNANDEZ VIRAMONTES;
23 Jason Brian GAVIDIA; LOS
24 ANGELES WORKER CENTER
25 NETWORK; UNITED FARM
26 WORKERS; COALITION FOR
27 HUMANE IMMIGRANT RIGHTS;
28 IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF EVA BITRAN
SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com
JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
SARA H. WORTH (SBN 341088)
sara.worth@mto.com
HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com
MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF EVA BITRAN

I, Eva Bitran, hereby declare:

1. I make this declaration based on my own personal knowledge. If called, I could and would competently testify hereto:

2. I am the Director of Immigrants' Rights and a Senior Staff Attorney at the American Civil Liberties Foundation of Southern California ("ACLUF-SC"), and counsel for Plaintiffs in this putative class action. I am a member in good standing of the California State Bar and of Bar of this Court. I have been at ACLU-SC since 2017, and have been involved in all aspects of this case. I was admitted to practice law in California in 2014. I submit this declaration in support of Plaintiffs' Motion for Class Certification on behalf of ACLU-SC, the American Civil Liberties Union Foundation of Norther California ("ACLUF-NC"), and the American Civil Liberties Union Foundation of San Diego and Imperial Counties ("ACLUF-SDIC").

3. ACLUF-NC, ACLUF-SC, and ACLUF-SDIC are nonprofit, nonpartisan corporations that are tax-exempt under § 501(c)(3) of the Internal Revenue Code. They are nonpartisan organizations dedicated to defending the civil liberties and civil rights guaranteed by the federal and state constitutions. ACLUF-NC, ACLUF-SC, and ACLUF-SDIC do not receive government funding. ACLUF-NC, ACLUF-SC, and ACLUF-SDIC have extensive experience in class litigation and immigrants' rights litigation and, collectively, have served as lead counsel in dozens of civil rights class actions, including before this Court.

4. I have extensive experience litigating complex civil litigation to defend and advance the rights of immigrants in the United States before this Court and others. I am admitted to practice before several federal courts, including the United States Court of Appeals for the Ninth Circuit and all U.S. District Courts in the State of California. I graduated from Harvard Law School in 2014. Following graduation, I served as a judicial clerk to the Honorable Edward C. Prado of the United States Court of Appeals for the Fifth Circuit. From September 2015 until December 2016,

1 I served as a Legal Fellow at the European Center for Constitutional and Human
2 Rights, where I investigated and prepared litigation before the European Court of
3 Human Rights regarding the rights of migrants at the external borders of the
4 European Union. Following my fellowship, I worked as a Trial Attorney in the
5 Federal Programs Branch of the United States Department of Justice. After joining
6 ACLUF-SC as a Staff Attorney in 2017, I became a Senior Staff Attorney in 2023
7 and the Director of Immigrants' Rights in 2024. In my current role, I supervise staff
8 attorneys, legal fellows, interns, students, organizers, and policy advocates in all
9 aspects of litigation and advocacy on behalf of immigrants.

10 5. I have spent the majority of my legal career representing immigrants in
11 federal class actions. For example, I am currently counsel in an action challenging
12 the lack of appointed representatives for immigrants with serious mental health
13 abilities. *See Franco-Gonzalez v. Holder*, Case No. 2:10-02211-DMG-DTB (C.D.
14 Cal. 2011). I am lead class counsel in *Hernandez Roman v. Wolf*, Case No 5:20-cv-
15 00768-TJH-PVC (C.D. Cal. 2020), a certified class action protecting the rights of
16 immigrants in detention from COVID-19, in which I have been intimately involved
17 in the daily conduct of litigation (including discovery, depositions, numerous
18 contested motions before the District Court and the U.S. Court of Appeals for the
19 Ninth Circuit, and extensive settlement negotiations through the Ninth Circuit
20 mediation program). I am also lead counsel in a putative class action challenging
21 access to counsel for immigrants detained at the Adelanto ICE Processing Center.
22 *See Torres v. Dep't of Homeland Security*, Case No. 5:18-02604-JGB-SHK (C.D.
23 Cal. 2017).

24 6. I have also served as counsel, including class counsel, in other complex
25 immigrants' rights cases including *National TPS Alliance et al. v. Noem*, No. 3:25-
26 cv-01766-EMC (N.D. Cal. 2025) (Venezuelan and Haitian TPS holders' challenge
27 to DHS's vacatur and termination of their status); *UFW v. Noem*, No. 1:25-cv-
28 00246-JLT-BAM (E.D. Cal 2025) (class action challenge to Border Patrol's

1 unlawful policy and practice of conducting suspicionless stops and warrantless
2 arrests in the Eastern District of California); *Kidd v. Mayorkas*, 2:20-cv-03512-
3 ODW-JPR (ensuring that immigration officers comport with federal law when
4 conducting law enforcement arrests at or near an individual's home), and *Orantes-*
5 *Hernandez v. Meese*, 685 F. Supp. 1488, 1511-14 (C.D. Cal. 1988), *aff'd sub nom*
6 *Orantes-Hernandez v. Thornburgh*, 919 F.2d 549 (9th Cir. 1990) (protecting rights
7 of Salvadoran nationals to seek asylum). I previously served as class counsel in a
8 class action aimed at preventing ICE from transferring detained immigrants out of
9 the region, *Arroyo v. Dep't of Homeland Security*, Case No. 8:19-00815-JGB-SHK
10 (C.D. Cal. 2019), for which I was awarded market-rate fees based on my
11 "distinctive knowledge and specialized skill" in litigating "complex cases involving
12 the constitutional rights of detained immigrants." *Id.* at ECF. No. 53, p. 7. I was
13 similarly awarded market-rate fees in a case seeking emergency relief to permit
14 immigrants detained in a federal prison access to their attorneys. *Rodriguez-Castillo*
15 *v. Nielsen*, Case No. 5:18-01317-ODW-KES (C.D. Cal. 2020), ECF No. 64
16 ("[C]ounselors' undisputed expertise on issues of statutory construction, detainee
17 rights, and effective advocacy in this challenging context was needed to effectively
18 pursue the emergency relief their clients obtained.").

19 7. Proposed Class Counsel **Mohammad Tajsar** is a Senior Staff Attorney
20 at the ACLUF-SC. He is admitted to practice before several federal courts, including
21 all U.S. District Courts in the State of California, the United States Court of Appeals
22 for the Ninth Circuit, and the U.S. Supreme Court. He graduated from the
23 University of California, Berkeley, School of Law in 2011. He served as a fellow at
24 the ACLUF-SC after graduating from law school, then as a law clerk to the
25 Honorable Miranda M. Du in the United States District Court, District of Nevada.
26 Following his clerkship, Mr. Tajsar served as an associate at Hadsell Stormer
27 Renick & Dai LLP, a nationally renowned private civil and human rights firm based
28 in Pasadena, California. While there, he litigated complex constitutional and

1 statutory cases concerning law enforcement misconduct, prison conditions, and
2 employment cases involving misconduct at large Fortune 500 companies. In 2017,
3 he returned to ACLUF-SC, where he has focused on litigating in the areas of
4 immigration enforcement, border security, national security policy, and police
5 misconduct.

6 8. Mr. Tajsar has significant experience as counsel in both class actions
7 and non-class matters against federal law enforcement agencies, with a special
8 emphasis on vindicating individuals' Fourth Amendment rights. He is currently
9 counsel for a putative class in *Fazaga v. FBI*, 8:11-cv-00301-DOC-VBK (C.D. Cal.
10 2011), a challenge to a federal government surveillance program targeting Muslim
11 Americans in Orange County, and for a certified class in *Wagafe v. Trump*, 2:17-cv-
12 00094-LK (W.D. Wash. 2017), a challenge to an immigration vetting program
13 instituted by United States Citizenship and Immigration Services. Mr. Tajsar also
14 served as trial counsel on behalf of a certified class in *Gonzalez v. ICE*, Case No.
15 2:13-cv-04416-AB-FFM (C.D. Cal. Jun. 19, 2013), a Fourth Amendment challenge
16 to immigration detainers unlawfully issued in the Central District of California. Mr.
17 Tajsar has served as lead counsel in two additional complex constitutional rights
18 challenges against federal immigration authorities' detentions and surveillance of
19 individuals at the United States border, *Phillips v. U.S. Customs and Border*
20 *Protection*, 2:19-cv-06338-SVW-JEM (C.D. Cal. 2019) and *Adlerstein v. U.S.*
21 *Customs and Border Protection*, 4:19-cv-00500-CKJ (D. Ariz.), and is counsel in a
22 third such case, *Kariye v. Noem*, 2:22-cv-01916-FWS-PVC (C.D. Cal. 2022). Mr.
23 Tajsar is also counsel for plaintiffs in *Los Angeles Press Club v. Kristi Noem*, 2:25-
24 cv-05563-HDV-E (C.D. Cal. 2025), a First, Fourth, and Fifth Amendment challenge
25 to the targeted use of force against protestors by many of the same Defendants in
26 this action. *Fazaga*, *Los Angeles Press Club*, *Gonzalez*, *Phillips*, *Adlerstein*, and
27 *Kariye* all raise, among other claims, Fourth Amendment challenges to conduct by
28 federal law enforcement or immigration enforcement authorities.

1 9. Proposed Class Counsel **Mayra Joachin** is the Deputy Director of
2 Immigrants' Rights and a Senior Staff Attorney at ACLUF-SC. She is admitted to
3 practice before several federal courts, including all U.S. District Courts in the State
4 of California, the United States Court of Appeals for the Ninth Circuit, and the U.S.
5 Supreme Court. She graduated from Columbia Law School in 2015 and joined
6 ACLUF-SC in March 2022. Before working at ACLUF-SC, Ms. Joachin was a Staff
7 Attorney at the National Immigration Law Center where she litigated complex cases
8 involving immigrants' rights and constitutional law. Ms. Joachin has significant
9 experience litigating complex immigrants' rights cases involving constitutional and
10 statutory violations and serving as class counsel. She is currently certified class
11 counsel for a settlement class in *Gonzalez v. ICE*, Case No. 2:13-cv-04416-AB-FFM
12 (C.D. Cal. Jun. 19, 2013) (a challenge to immigration detainers issued in the Central
13 District of California unlawfully) and class counsel in *UFW v. Noem*, No. 1:25-cv-
14 00246-JLT-BAM (E.D. Cal 2025) (class action challenge to Border Patrol's
15 unlawful policy and practice of conducting suspicionless stops and warrantless
16 arrests in the Eastern District of California). She has served as co-lead counsel in
17 *Batalla Vidal v. Wolf*, Case No. 1:16-cv-04756 (NGG) (JO) (E.D.N.Y. Aug. 25,
18 2016) (a certified class action on behalf of approximately one million Deferred
19 Action for Childhood Arrival ("DACA") recipients challenging rescissions to
20 DACA) and *Georgia State Conference of the NAACP v. City of LaGrange*, Case No.
21 3:17-cv-067-TCB (N.D. Ga. Dec. 7, 2017) (lawsuit resulting in a settlement in an
22 challenge to discriminatory utility policies that prevented immigrants from
23 accessing essential utilities). She has also litigated other complex cases involving
24 immigrants' rights, including *Mendez v. ICE*, Case No. 3:23-cv-00829-TLT (N.D.
25 Cal. Mar. 10, 2023) (an action on behalf of immigrant detainees challenging
26 retaliation by facility staff); *La Clinica v. Biden*, Case No. 19-cv-04980-PHJ (N.D.
27 Cal. Aug. 16, 2019) (a challenge to the unlawful promulgation of the public charge
28 rule, a rule concerning noncitizen admissibility requirements); and *UFW*

1 *Foundation v. County of Kern*, Case No. BCV-23-101419 (JRB) (Kern Cty. Sup. Ct.
2 May 8, 2023) (a challenge to misdemeanor arraignment proceedings that resulted in
3 inadmissibility and removability consequences for immigrants).

4 10. Proposed Class Counsel **Bree Bernwanger** is a Senior Staff Attorney
5 at ACLUF-NC. She is a member in good standing of the California State Bar and of
6 the Bar of this Court. Ms. Bernwanger is a 2010 graduate of Georgetown University
7 Law Center. She began her career working on civil rights impact litigation and
8 policy as a pro bono fellow at the New York Civil Liberties Union (2011), then
9 worked as a litigation associate at the law firm of Sidley Austin LLP in New York
10 (2011-13). In both roles, she worked on complex civil litigation. Ms. Bernwanger
11 served as a Clinical Fellow in Albany Law School's clinical program (2014-15),
12 where she taught and supervised students handling family and immigration matters,
13 and as the Director of the Unaccompanied Immigrant Children and Immigrant
14 Families Project at Fordham Law School (2015-17), where she developed and
15 supervised student and alumni pro bono efforts on behalf of detained immigrant
16 families, and was involved in policy advocacy related to unaccompanied immigrant
17 children and immigrant families. She further served as Managing Attorney for the
18 Dilley Pro Bono Project from August 2016 to January 2017, where she was
19 responsible for the provision of pro bono representation to thousands of asylum-
20 seeking families in the South Texas Family Residential Center, the nation's largest
21 immigration detention center. She supervised a staff of attorneys, legal assistants,
22 and a rotating team of volunteers. She monitored detention conditions and
23 participated in systemic advocacy on behalf of detained families. Immediately prior
24 to her current employment, she was a Senior Staff Attorney at the Lawyers'
25 Committee for Civil Rights of the San Francisco Bay Area ("LCCR") (2017-23),
26 where she managed all litigation and systemic-reform advocacy related to
27 immigrants' rights, and for two years (2017-19), additionally managed LCCR's full
28 immigration removal defense docket, primarily involving asylum, withholding of

1 removal, and Special Immigrant Juvenile Status cases.

2 11. Ms. Bernwanger has extensive experience litigating complex civil
3 litigation to defend and advance the rights of immigrants in the United States. She is
4 admitted to the U.S. Court of Appeals for the Ninth Circuit, the Northern District of
5 California, the Eastern District of California, and the Southern District of California.
6 She has served as class co-counsel for certified classes in *Zepeda Rivas v. Jennings*,
7 No. 3:20-cv-02731 (N.D. Cal. 2020), a due process challenge against ICE by
8 individuals detained in crowded immigration jails during the COVID-19 pandemic,
9 which she argued before the Ninth Circuit and which ultimately resulted in a
10 classwide settlement agreement; *J.L. v. Cissna*, No. 5:18-cv-04914-NC (N.D. Cal.
11 2018), an Administrative Procedure Act challenge to unlawful change in policy for
12 Special Immigrant Juvenile Status adjudication that resulted in a classwide
13 settlement agreement; and *Unknown Parties v. Nielsen*, 4:15-cv-00250, (D. Ariz.
14 2015), a substantive due process challenge to conditions of confinement in Border
15 Patrol's Tucson Sector that resulted in a permanent injunction protecting the class.

16 12. In addition, she has represented noncitizen plaintiffs or petitioners in
17 several non-class cases raising complex issues. For example, she has served as
18 counsel in *Mendez v. ICE*, No. 3:23-cv-00829 (N.D. Cal. 2023), a First Amendment
19 challenge by dozens of hunger strikers in ICE custody; *P.G. v. United States*, No.
20 4:21-cv-4457 (N.D. Cal. 2021), a Federal Tort Claims Act suit on behalf of families
21 who were separated at the U.S.-Mexico border in 2018, which included complex
22 mandamus proceedings at the Ninth Circuit involving a former Secretary of the
23 Department of Homeland Security; and *Murillo Vega v. Management and Training*
24 *Corp.*, No. 3:21-cv-01770-GPC-LR (S.D. Cal. 2021), the first lawsuit to be brought
25 under California's "Dignity Not Detention Act." She has also represented numerous
26 detained immigrants in federal court *habeas corpus* petitions raising constitutional
27 challenges to their ongoing detention. She has been awarded market-rate fees in
28 federal litigation based in part on my "extensive experience litigating immigration

1 cases.” *Primero Garcia v. Barr*, 484 F. Supp. 3d 750, 756 (N.D. Cal. 2020).

2 13. Proposed Class Counsel **Stephanie Padilla** has worked as a staff
3 attorney with the ACLUF-SC since 2019. She is licensed to practice before the
4 courts of the State of California, the United States Court of Appeals for the Ninth
5 Circuit, and the United States District Courts for the Southern, Central, Northern,
6 and Eastern Districts of California. Ms. Padilla graduated from the University of
7 California, Davis School of Law in 2016. Previously, she was an Assistant General
8 Counsel at the Agricultural Labor Relations Board, from 2017 to 2019. Ms.
9 Padilla’s practice at the ACLUF-SC has involved litigating complex civil liberties
10 matters in federal court. Ms. Padilla is co-class counsel in *Kidd v. Mayorkas*, 2:20-
11 cv-03512-ODW-JPR (ensuring that immigration officers comport with federal law
12 when conducting law enforcement arrests at or near an individual’s home). She was
13 counsel in *Zepeda Rivas v. Jennings*, No. 3:20-cv-02731-VC, 445 F. Supp. 3d 36
14 (N.D. Cal. Apr. 29, 2020) (class action challenging unsafe COVID-19 conditions in
15 immigration detention); *Bahena Ortuno v. Jennings*, No. 3:20-cv-02064-MMC,
16 2020 WL 2218965 (N.D. Cal. May 7, 2020), *appeal dismissed sub nom. Lavrus v.*
17 *Jennings*, No. 20-16302, 2020 WL 7873088 (9th Cir. Nov. 18, 2020) (constitutional
18 challenge to conditions of confinement in immigration detention), habeas litigation
19 on behalf of detained individuals with serious medical vulnerabilities that preceded
20 this class action lawsuit. Ms. Padilla also served as co-counsel in *Bello-Reyes v.*
21 *Gaynor*, 985 F.3d 696 (9th Cir. 2021) (habeas appeal challenging retaliatory actions
22 by ICE in response to plaintiff’s criticism of the agency). Ms. Padilla was also co-
23 lead counsel in *Simental v. Ozuna*, No. 1:20-cv-00697-NONE-JLT (E.D. Cal. July
24 13, 2020) (damages action arising from false arrest and imprisonment, use of
25 excessive force, and retaliation for exercising First Amendment rights). Ms. Padilla
26 has also represented clients facing removal in administrative proceedings before
27 federal agencies such as the Board of Immigration Appeals including, for example,
28 an appeal challenging the Immigration Judge’s failure to appoint her client (a blind

1 person) counsel or provide reasonable accommodations.

2 14. Proposed Class Counsel **Dae Keun Kwon** is Senior Policy Counsel and
3 has worked as an attorney with the ACLUF-SC since 2016. He is licensed to
4 practice before the courts of the State of California and the United States District
5 Court for the Central District of California. Mr. Kwon graduated from the
6 University of California, Los Angeles School of Law in 2016 and also holds a
7 Master of Public Administration degree from the Maxwell School of Syracuse
8 University. Following graduation, he worked as the Emerson Equal Justice Works
9 Fellow at the ACLUF-SC focusing on the intersection of criminal and immigration
10 law and enforcement.

11 15. Mr. Kwon has served as counsel in *Inland Empire Immigrant Youth*
12 *Collective v. Duke*, No. 5:17-cv-02048 (C.D. Cal. Feb. 26, 2018) (class action
13 challenging the federal government's unlawful revocation of Deferred Action for
14 Childhood Arrivals (DACA) status without first giving individuals with DACA
15 notice and an opportunity to challenge the revocation) and *Black Lives Matter - Los*
16 *Angeles v. City of Los Angeles*, No. 2:20-cv-04940 (C.D. Cal. 2020) (challenging
17 curfews issued by the City and County of Los Angeles in response to protests
18 surrounding the police killing of George Floyd as violations of free speech and
19 assembly, free movement, and due process). Mr. Kwon has also represented clients
20 facing removal or seeking immigration relief in state court proceedings as well as in
21 administrative proceedings before federal agencies. Furthermore, Mr. Kwon has
22 extensive experience with working with class members. As local counsel, he has
23 worked closely with individual plaintiffs and organizational plaintiffs.

24 16. Proposed Class Counsel **Diana Sánchez** is a staff attorney at ACLUF-
25 SC. She is a member of the Bar of the State of California, and admitted to practice
26 before several federal courts, including the Northern District of California, the
27 Central District of California, and the United States Court of Appeals for the Ninth
28 Circuit. Ms. Sánchez graduated with distinction from Stanford Law School in 2020.

1 Following graduation, she served as a judicial clerk to the Honorable Keith P.
2 Ellison in the Southern District of Texas and the Honorable Richard A. Paez of the
3 Ninth Circuit Court of Appeals. She then worked as a Skadden Fellow at the
4 Immigrant Defenders Law Center where she specialized in immigrants' rights civil
5 litigation and appellate proceedings challenging petitions for review of removal
6 orders. She has worked at ACLU SoCal since June 2023, first as a Skadden Fellow
7 and, since the completion of her fellowship in September 2024, as a staff attorney.

8 17. Ms. Sánchez has experience and expertise on immigrants' rights issues
9 and complex civil litigation, including immigration enforcement, civil rights and
10 liberties, and related statutory and regulatory rights. In addition to serving as counsel
11 in the present matter, Ms. Sánchez is co-counsel in *Kidd v. Mayorkas*, 2:20-cv-
12 03512-ODW-JPR (ensuring that immigration officers comport with federal law
13 when conducting law enforcement arrests at or near an individual's home). Ms.
14 Sánchez is also counsel in *Franco Gonzalez v. Holder*, Case No. CV-10-02211
15 DMG (DTBx) (C.D. Cal. 2010) (class action challenging detention and removal
16 proceedings without reasonable accommodations, including right to counsel and
17 bond hearing, for detained immigrants with serious mental health disabilities);
18 *Adlerstein v. United States Customs and Border Protection*, Case No. 4:19-cv-
19 00500-CKJ (D. Az. 2019) (lawsuit challenging border searches, seizures, and
20 surveillance of immigrants' rights activists); and *National TPS Alliance et al. v.*
21 *Noem*, No. 3:25-cv-01766-EMC (N.D. Cal. 2025). Ms. Sánchez has also litigated
22 individual cases involving constitutional and statutory rights of immigrants before
23 the immigration court, the Board of Immigration Appeals, and in the Ninth Circuit
24 Court of Appeals. For example, she is presently lead counsel in *Pacheco v. Garland*,
25 Case No. 24-5108 (9th Cir. 2024), and *Rosas Rosas v. Becerra*, Case No. 23-4103
26 (9th Cir. 2023). She previously served as counsel in petition for rehearing en banc
27 proceedings in *Phillips v. U.S. Customs & Border Prot.*, 102 F.4th 1110 (9th Cir.
28 2024) (order), and *Hernandez v. Garland*, Case No. 20-72138 (9th Cir. 2020), and

1 as amicus counsel in *Garcia Alvarez v. Garland*, Case No. 23-26 (9th Cir. 2023).

2 18. Proposed Class Counsel **Brisa Velazquez Oatis** is a Staff Attorney at
3 ACLUF-SDIC. She has been employed as a Staff Attorney at ACLUF-SDIC since
4 2024. She is a member in good standing of the California State Bar and of the Bar of
5 this Court. She is admitted to the U.S. Court of Appeals for the Ninth Circuit and the
6 Southern District of California. Ms. Velazquez is a 2018 graduate of the University
7 of San Diego School of Law where she received the California State Bar's Wiley W.
8 Manual Award and the Outstanding Clinic Intern Award for successfully
9 representing individuals in front of the California Unemployment Insurance Appeals
10 Board and California's Department of Industrial Relations Labor Commissioner's
11 Office. She has experience in civil litigation raising complex issues including
12 immigrant workers' rights, gender, race, and disability discrimination, harassment,
13 and retaliation cases. She also has experience representing noncitizen plaintiffs and
14 petitioners in immigration matters. Since her employment with ACLUF-SDIC, Ms.
15 Velazquez has been focused on complex civil litigation to advance the rights of
16 immigrants in the United States. She is co-counsel in the class action lawsuit *Doe v.*
17 *Wolf*, No. 19-cv-2119-DMS-SBC, ECF. No. 39 (S.D. Cal. Jan. 14, 2019) (order
18 granting class certification). *Doe* challenges the denial of access to counsel prior to
19 and during non-refoulement interviews, which determine whether individuals
20 subject to the Migrant Protection Protocols should be allowed to enter the United
21 States during the pendency of their immigration court proceedings.

22 19. ACLUF-NC, ACLUF-SC, and ACLUF-SDIC have experience fairly
23 and adequately representing the interests of the class in other class actions. ACLUF-
24 NC, ACLUF-SC, and ACLUF-SDIC have capacity to thoroughly and vigorously
25 litigate the claims in this case and properly represent the plaintiff class, and intend to
26 commit all necessary resources to do so.

27
28

1 20. If appointed class counsel, I will ensure that the attorneys listed in this
2 declaration and I zealously represent the interests of the class to the best of our
3 collective ability.

4 21. I am not aware of any conflict among potential class members in this
5 case.

6 22. I am not aware of any conflicts between ACLUF-NC, ACLUF-SC,
7 ACLUF-SDIC, and any members of the potential class that would prevent ACLUF-
8 NC, ACLUF-SC, and ACLUF-SDIC from providing zealous representation to the
9 class.

10 I declare under penalty of perjury that the foregoing is true and correct.

11
12
13
14 Executed August 6, 2025 in Riverside, California.

15
16
17
18
19
20
21
22
23
24
25
26
27
28



Eva L. Bitran

EXHIBIT 3

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*

9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*

11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*

13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*

15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*

19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*

21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 (Additional counsel listed on next page)

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org

REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org

SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org

RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org

GINA AMATO (SBN 215519)
gamato@publiccounsel.org

PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu

UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 UNITED STATES DISTRICT COURT
19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES; Jason
24 Brian GAVIDIA; LOS ANGELES
25 WORKER CENTER NETWORK;
26 UNITED FARM WORKERS;
27 COALITION FOR HUMANE
28 IMMIGRANT RIGHTS; IMMIGRANT
DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as
Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF ANNE LAI
IN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah
Frimpong

Security; Todd M. LYONS, in his official
capacity as Acting Director, U.S.
Immigration and Customs Enforcement;
Rodney S. SCOTT, in his official capacity
as Commissioner, U.S. Customs and
Border Patrol; Michael W. BANKS, in his
official capacity as Chief of U.S. Border
Patrol; Kash PATEL, in his official
capacity as Director, Federal Bureau of
Investigation; Pam BONDI, in her official
capacity as U.S. Attorney General;
Ernesto SANTACRUZ JR., in his official
capacity as Acting Field Office Director
for Los Angeles, U.S. Immigration and
Customs Enforcement; Eddy WANG,
Special Agent in Charge for Los Angeles,
Homeland Security Investigations, U.S.
Immigration and Customs Enforcement;
Gregory K. BOVINO, in his official
capacity as Chief Patrol Agent for El
Centro Sector of the U.S. Border Patrol;
Jeffrey D. STALNAKER, in his official
capacity as Acting Chief Patrol Agent,
San Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in Charge,
Los Angeles Office, Federal Bureau of
Investigation; Bilal A. ESSAYLI, in his
official capacity as U.S. Attorney for the
Central District of California,

Defendants.

JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com
JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
SARA H. WORTH (SBN 341088)
sara.worth@mto.com
HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com
MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguila@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF ANNE LAI

I, ANNE LAI, hereby declare:

1. I make this declaration based on my personal knowledge. If called, I could and would competently testify hereto. This declaration is made in support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel.

2. I currently serve as Clinical Professor of Law, Co-Associate Dean of Experiential Learning, and Director of the Immigrant and Racial Justice Solidarity Clinic at the University of California, Irvine School of Law ("UCI Law"). I am duly licensed to practice law in the State of California and have been a practicing attorney for approximately 18 years. As counsel of record for Stop/Arrest Plaintiffs, I have been involved in nearly all aspects of this case.

3. I am a 2006 graduate of the New York University School of Law, where I was a Root-Tilden-Kern Public Interest Scholar. I received my B.A. from Duke University, graduating *summa cum laude*, in 2002. After law school, I clerked for the Honorable James C. Francis IV in the Southern District of New York. From 2006 to 2007, I worked as a Staff Attorney with the Urban Justice Center Community Development Project in New York. From 2008 to 2011, I worked with the ACLU of Arizona, first as a Racial Justice Fellow and then as a Staff Attorney. In 2011, I left the ACLU of Arizona to join the faculty at Yale Law School. I served first as a Clinical Teaching Fellow and then later as a Clinical Lecturer in Law. I joined the faculty at UCI Law in 2013.

4. In addition to California, I am a member of good standing of the bar of the State of New York. I am admitted to practice before several federal courts, including the U.S. District Courts for the Central District of California, Southern District of New York, and the District of Connecticut, the U.S. Court of Appeals for the Second and Ninth Circuits, and the U.S. Supreme Court.

1 5. The UCI Law Immigrant and Racial Justice Solidarity Clinic is a law
2 school clinic based in Irvine, California that provides legal support and representation
3 to communities in Southern California and beyond fighting against racial subordination in
4 multiple, intersecting systems across a variety of areas of law. A core part of the Clinic's
5 work involves litigation to protect the civil and constitutional rights of immigrants. The
6 Clinic is comprised of supervising attorneys, such as myself, and law students
7 working under close faculty supervision. All of our services are provided on a pro
8 bono basis.

9 6. As director of the Clinic, I have substantial experience litigating complex
10 civil and constitutional rights cases in the federal courts, and many of the cases I
11 have litigated have involved the protection of immigrants' rights. During my time at
12 the ACLU of Arizona, I served as a member of the monitoring team for plaintiffs in
13 *Arnold v. Ariz. Dep't of Public Safety*, No. CV-01001463-PCT-JAT (D. Ariz. 2006)
14 (class action alleging pattern and practice of racial profiling in traffic stops) and
15 *Graves v. Arpaio*, No. CV-77-00479-PHX-NVW (D. Ariz. 2008) (class action
16 relating to conditions in the Maricopa County Jails). I also represented the plaintiff or
17 plaintiffs in *Ortega Melendres v. Arpaio*, No. CV-07-2513-PHX-GMS (D. Ariz.
18 2007) (class action against the Maricopa County Sheriff's Office (MCSO) alleging
19 pattern and practice of racial discrimination and Fourth Amendment violations,
20 including in immigration-related operations), *Lopez-Valenzuela v. Maricopa County*,
21 No. 08-cv-660-SRB (D. Ariz. 2008) (class action challenging Arizona state
22 constitutional amendment prohibiting release on bail of criminal defendants alleged
23 to be undocumented immigrants), *Mabrouk v. Arpaio*, No. 09-cv-01184 (D. Ariz.
24 2009) (1983 damages action on behalf of Muslim woman detained in Maricopa
25 County Jail that led to change in MCSO policy on religious head coverings at intake
26 and booking), and *Valle del Sol v. Whiting*, No. 10-01061 (D. Ariz. 2010) (challenge
27 to constitutionality of Arizona's state immigration law, S.B. 1070 2010). In addition,
28 I served as the lead attorney in *Mora v. Arpaio*, No. 09-cv-1719-DGC (D. Ariz.

2011) (damages action on behalf of U.S. citizen and lawful permanent resident detained by MCSO in connection with worksite raid), successfully obtaining a \$200,000 settlement after prevailing in part on summary judgment.

7. After entering law teaching, I continued to litigate complex cases in federal court. For example, I served as counsel for plaintiffs in *Chacon v. East Haven Police Dep't*, No. 10 CV 1692 (JBA) (D. Conn. 2010) (action against EHPD challenging a pattern and practice of discriminatory policing and excessive force) and *Brizuela v. Feliciano*, No. 12-cv-0226 (JBA) (D. Conn. 2012) (class action challenging Connecticut Department of Corrections' practice of holding individuals on immigration detainers without probable cause past their time in state criminal custody). In my personal capacity, I continued to serve as counsel to plaintiffs in *Ortega Melendres v. Arpaio*, arguing before the Ninth Circuit Court of Appeals, serving as a member of the trial team, and playing a substantial role in fashioning comprehensive relief following the District Court's issuance of its Findings of Fact and Conclusions of Law. Further, I represented several immigration clients in federal court actions, such as *Pierre v. Holder*, No. 10-2131 (2nd Cir. 2010) (petition for review involving claim of derivative citizenship based on constitutional equal protection grounds).

8. The Immigrant and Racial Justice Solidarity Clinic was previously called the Immigrant Rights Clinic. The Immigrant Rights Clinic, under my direction, served as lead counsel in *Puente v. Arpaio*, No. 2:14-cv-01356-DGC (D. Ariz. 2017) (action challenging Maricopa County law enforcement officials' practice of arresting and prosecuting immigrant workers for I-9 related conduct that followed from their undocumented status). We also served—and still serve—as counsel in *Kidd v. Noem*, No. 2:20-cv-03512-ODW-JPR (C.D.Cal. 2020) (action challenging immigration officers' home arrest practices including ruse practices and “knock and talk” practices). In addition, the Clinic has litigated numerous cases before the immigration courts and Board of Immigration Appeals, as well as the California

1 state courts. And the Clinic has led a number of lawsuits under the Freedom of
2 Information Act seeking records related to immigration enforcement operations and
3 activity. *See, e.g., UCI Law School Immigrant Rights Clinic v. ICE*, No. 8:20-cv-
4 01188-DOC-KES (C. D. Cal. 2020) (Freedom of Information Act lawsuit seeking
5 records about ICE's relationship with the private contractor Palantir Technologies, Inc.).

6 9. Several of the cases I identify above, the *Arnold*, *Ortega Melendres*,
7 *Brizuela*, and *Kidd* cases, have involved systemic challenges based on the Fourth
8 Amendment (among others grounds) through the class action device. The classes
9 were certified in all four cases.

10 10. In addition to my litigation practice, I have also given lectures, CLEs,
11 authored publications on and/or provided mentorship to other attorneys in my areas
12 of expertise—namely, federal immigration law, procedural issues arising from the
13 enforcement of federal immigration law, constitutional policing, and the intersection
14 between immigration law and other areas of law more generally. I am very familiar
15 with the inner workings of DHS, ICE, and CBP, as well as the unique needs of the
16 immigrant community, and have provided guidance and assistance to numerous
17 attorneys litigating cases involving immigration and constitutional rights issues.

18 11. Finally, I have represented numerous immigrant advocacy organizations
19 and immigration law scholars as *amici* in the federal courts. For example, I served as
20 lead counsel for *amici* in *Kansas v. Garcia*, Case No. 17-834 (S. Ct. 2019)
21 (addressing preemption of state I-9 related prosecutions) and co-lead counsel in
22 *Ortiz Becerra v. Barr*, Case No. 17-70859 (9th Cir. 2019) (addressing legality of
23 ICE home enforcement practices) and *Ixchop Perez v. Barr*, Case No. 19-71144 (9th
24 Cir. 2019) (similar).

25 12. The Clinic and I have capacity to thoroughly and vigorously litigate the
26 claims in this case and properly represent the proposed class.

27 13. I am not aware of any conflict among potential class members in this
28 case. I am not aware of any conflict between the UCI Law Immigrant and Racial

1 Justice Solidarity Clinic and any members of the potential class that would prevent
2 the Clinic from representing the interests of the class. If appointed class counsel, I
3 will ensure that the Clinic and I fairly, adequately, and zealously represent the class.
4

5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct.
7

8 Executed this 5th day of August, 2025, in Santa Ana, California.
9

10
11 

12 Anne Lai

13 *Counsel for Stop/Arrest Plaintiffs*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 4

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*

9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*

11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*

13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*

15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*

19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*

21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org

REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org

SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org

RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org

GINA AMATO (SBN 215519)
gamato@publiccounsel.org

PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu

UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 Pedro VASQUEZ PERDOMO; Carlos
20 Alexander OSORTO; and Isaac
21 VILLEGAS MOLINA; Jorge
22 HERNANDEZ VIRAMONTES;
23 Jason Brian GAVIDIA; LOS
24 ANGELES WORKER CENTER
25 NETWORK; UNITED FARM
26 WORKERS; COALITION FOR
27 HUMANE IMMIGRANT RIGHTS;
28 IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland
Security; Todd M. LYONS, in his

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF STACY
TOLCHIN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

official capacity as
Acting Director, U.S. Immigration and
Customs Enforcement; Rodney S.
SCOTT, in his official capacity as
Commissioner, U.S. Customs and
Border Patrol; Michael W. BANKS, in
his official capacity as Chief of U.S.
Border Patrol; Kash PATEL, in his
official capacity as Director, Federal
Bureau of Investigation; Pam BONDI,
in her official capacity as U.S.
Attorney General; Ernesto
SANTACRUZ JR., in his official
capacity as Acting Field Office
Director for Los Angeles, U.S.
Immigration and Customs
Enforcement; Eddy WANG, Special
Agent in Charge for Los Angeles,
Homeland Security Investigations,
U.S. Immigration and Customs
Enforcement; Gregory K. BOVINO,
in his official capacity as Chief Patrol
Agent for El Centro Sector of the U.S.
Border Patrol; Jeffrey D.
STALNAKER, in his official capacity
as Acting Chief Patrol Agent, San
Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

JACOB S. KREILKAMP (SBN
248210)

jacob.kreilkamp@mto.com

JAMIE LUMA (SBN 331610)

jamie.luma@mto.com

SARA H. WORTH (SBN 341088)

sara.worth@mto.com

HENRY D. SHREFFLER (SBN
343388)

henry.shreffler@mto.com

MAGGIE BUSHELL (SBN 354048)

maggie.bushell@mto.com

KYLE A. GROVES (SBN 358085)

kyle.groves@mto.com

MUNGER, TOLLES & OLSON LLP

350 S. Grand Ave., 50th Floor

Los Angeles, CA 90071

Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)

jessica@ndlon.org

LAUREN MICHEL WILFONG*

lwilfong@ndlon.org

NATIONAL DAY LABORER
ORGANIZING NETWORK

1030 S. Arroyo Parkway, Suite 106

Pasadena, CA 91105

Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)

bbernwanger@aclunc.org

AMERICAN CIVIL LIBERTIES

UNION FOUNDATION OF

NORTHERN CALIFORNIA

39 Drumm Street

San Francisco, CA 94111

Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)

bvoatis@aclu-sdic.org

ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES

P.O. Box 87131

San Diego, CA 92138-7131

Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com

MACK E. JENKINS (SBN 242101)

mjenkins@heckerfink.com

HECKER FINK LLP

1150 South Olive Street, Suite 10-140

Los Angeles, CA 90015

Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO

(SBN 285567)

eaguilasocho@farmworkerlaw.com

MARTINEZ AGUILASOCHO LAW, INC.

900 Truxtun Ave, Suite 300

Bakersfield, CA 93301

Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*

cbergquist@chirla.org

COALITION FOR HUMANE

IMMIGRANT RIGHTS

2351 Hempstead Road

Ottawa Hills, OH 43606

Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)

ahuerta@immdef.org

BRYNNA BOLT (SBN 339378)

bbolt@immdef.org

ALISON STEFFEL (SBN 346370)

asteffel@immdef.org

IMMIGRANT DEFENDERS LAW
CENTER

634 S. Spring St., 10th Floor

Los Angeles, CA 90014

Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF STACY TOLCHIN

I, STACY TOLCHIN, declare under the penalty of perjury as follows:

1. I am an attorney licensed to practice by the State of California, and am admitted to practice before the United States Supreme Court; the United States Court of Appeals for the Ninth, Tenth, Fifth, and Second Circuits; and the United States District Court for the Northern District of California, Eastern District of California, Central District of California, Southern District of California, Court of Federal Claims, and District of New Mexico.

2. I represent the Stop/Arrest Plaintiffs in the above-captioned action.

3. My business address is Law Offices of Stacy Tolchin, 776 E. Green St. Suite 210, Pasadena, CA 91101. I practice throughout the state of California.

4. I received my Juris Doctorate from the University of California at Los Angeles in 2001, and have been practicing law for over 23 years.

5. I am a recipient of the American Immigration Lawyers' Association Southern California Chapter 2019 Annual Pro Bono Award, the University of California at Los Angeles Law School's 2018 Alumni Public Service Award, the National Lawyers Guild of Southern California 2017 annual award, the American Immigration Lawyers Association's 2009 Jack Wasserman Award for Excellence in Immigration Litigation, the 2009 American Civil Liberties Union of Southern California Equal Justice Advocacy Award, the 2008 National Immigration Law Center Annual Award, the 2007 "Unsung Hero" Award for the National Lawyers Guild of the Bay Area, and was recognized in 2003 by the Arab-American Anti-Discrimination Committee of San Francisco. I was also named to "Super Lawyers" from 2012-2024.

6. I am a former member of the Board of Directors of the National Immigration Project for the National Lawyers Guild, a member of the National Lawyers Guild, the Los Angeles County Bar Association immigration section, and the American Immigration Lawyers Association.

1 7. I have deep expertise and extensive practice experience in immigration law.
2 I specialize in immigration-related litigation before the federal courts. Cases I have
3 litigated include: *Boch-Saban v. Garland*, 30 F.4th 411 (5th Cir. 2022) (establishing
4 that an appeal to the Board of Immigration Appeals is non-jurisdictional and subject
5 to exception); *Alvarado-Herrera v. Garland*, 993 F.3d 1187, 1190 (9th Cir. 2021)
6 (establishing the legal standard for the “reasonable fear” screening test before an
7 immigration judge); *Arce v. United States*, 899 F.3d 796 (9th Cir.) (establishing that
8 the federal courts have authority to consider damages actions under the Federal Tort
9 Claims Act in cases involving unlawful deportations); *Bonilla v. Lynch*, 840 F.3d
10 575, 592 (9th Cir. 2016) (establishing federal court jurisdiction to review motions to
11 sua sponte reopen based on changes in law); *Mendiola v. Holder*, 576 F. App’x 828
12 (10th Cir. 2014) (petition for review in Tenth Circuit challenging removal of a
13 lawful permanent resident based on change in law); *Bains v. Holder*, 584 F. App’x
14 574 (9th Cir. 2014) (petition for review challenging removal order based on changed
15 circumstances arising in India); *Huerta v. Holder*, 484 F. App’x 172 (9th Cir. 2012)
16 (petition for review based on ineffective assistance of counsel); *Padilla-Padilla v.*
17 *Gonzales*, 463 F.3d 972 (9th Cir. 2006) (challenge to Board of Immigration
18 Appeals’ failure to follow its internal regulations); *Silaya v. Mukasey*, 524 F.3d
19 1066 (9th Cir. 2008) (finding that victim of gang-rape in the Philippines had
20 suffered past persecution based on her father’s political opinion); *Husyev v.*
21 *Mukasey*, 528 F.3d 1172 (9th Cir. 2008) (finding that courts have jurisdiction to
22 review agency’s failure to follow asylum regulations); *Hassine v. Johnson*, 2014
23 WL 5035173 (E.D.Cal. 2014) (petition for *de novo* naturalization case and award of
24 attorneys’ fees); *Zavala v. Ridge*, 310 F. Supp. 2d 1071 (N.D. Cal. 2004)
25 (Department of Homeland Security’s “automatic stay” regulation that keeps non-
26 citizens in custody while their immigration cases are pending, even after an
27 immigration judge has ordered their release, is facially unconstitutional); *Singh v.*
28 *Still*, 470 F.Supp.2d 1064 (N.D. Cal 2007) (successful petition for writ of mandamus

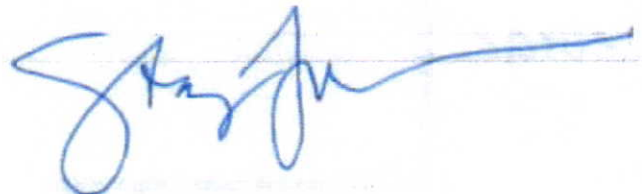
1 challenging Department of Homeland Security's unreasonable delay in the
2 adjudication of applications for permanent residency); *Shahwan v. Chertoff*, C 05
3 4218 MMC (N.D. Cal. 2005) (granting petition for writ of habeas corpus where
4 petitioner was not informed when he traveled on "advance parole" that he would be
5 ineligible for a bond hearing before an immigration judge); and *Araujo v. INS*, 301
6 F. Supp. 2d 1095 (N.D. Cal. 2004) (Federal Tort Claims Act action finding that the
7 United States government was liable for damages to a non-citizen for unlawful
8 deportation).

9 8. I have also served as class counsel in immigration-related actions. *Duran*
10 *Gonzales v. U.S. Dep't of Homeland Sec.*, 712 F.3d 1271 (9th Cir. 2013) (class
11 action litigation involving applications for lawful permanent residency where the
12 applicants had been previously deported); *Wagafe v. Trump*, No. C17-94 RAJ, 2017
13 WL 5990134, at *2 (W.D. Wash. Oct. 19, 2017) (class action challenging purported
14 national security delays in adjudicating applications for permanent resident status
15 and naturalization: *Nightingale v. U.S. Citizenship & Immigr. Servs.*, 333 F.R.D. 449
16 (N.D. Cal. 2019) (national class action on FOIA delay litigation).

17 9. I have capacity to thoroughly and vigorously litigate the claims in this case
18 and properly represent the plaintiff class, and intend to commit all necessary
19 resources to do so.

20
21 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the
22 foregoing is true and correct.

23 Executed this 4th day of August, 2025 in Pasadena, California.

24
25
26
27
28


Stacy Tolchin

EXHIBIT 5

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JESSICA KARP
BANSAL SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com
JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
SARA H. WORTH (SBN 341088)
sara.worth@mto.com
HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com
MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF JESSICA KARP BANSAL

I, JESSICA KARP BANSAL, declare and state as follows:

1. I am counsel with the National Day Laborer Organizing Network (NDLON). I am duly licensed to practice law in the State of California. I am counsel of record for Plaintiffs in this action. I have knowledge of the facts set forth herein, and if called upon to testify as a witness thereto, I could and would competently do so under oath.

2. I have been a member of the California bar since 2011 and the New York bar since 2010. I graduated from Columbia Law School in 2009. Following graduation, I served as a judicial clerk to the Honorable Stephen Reinhardt of the Ninth Circuit Court of Appeals. From 2010 to July 2019, I worked at the National Day Laborer Organizing Network, where I held the titles of Staff Attorney, Litigation Director, and Legal Director. From 2013 to 2015, I also worked as an adjunct law professor at the immigrant rights clinic at the University of California at Irvine School of Law. From 2019 to 2022, I worked as a senior staff attorney at the ACLU of Southern California. From 2022 to 2025, I worked as the Legal Director for Organized Power in Numbers. Since February 2025, I have returned to the National Day Laborer Organizing Network.

3. I am a member of the Bar of the State of California, the Bar of the State of New York, and am admitted to several federal courts, including the Central District of California, the Northern District of California, and the United States Court of Appeals for the Ninth Circuit.

4. NDLON is dedicated to advancing the rights of immigrant and low wage workers in the United States, including through litigation and advocacy. NDLON has substantial expertise in class action litigation and immigrants' rights litigation, and has participated in numerous cases in federal court related to policies and practices of the federal immigration system.

5. I have substantial experience litigating cases involving immigrants'

1 rights. I have spent my entire legal career working on immigrants' rights cases. I
2 have represented immigrants in a number of cases addressing systemic issues in
3 the federal immigration system through class actions. For example, I was co-lead
4 counsel in the following class actions challenging federal immigration enforcement
5 and detention policies: *Hernandez Roman v. Wolf*, No. 20- cv-00768 (C.D. Cal.
6 2020) (class action challenge to constitutionality of immigration detention during
7 the COVID-19 pandemic); *Gonzalez v. ICE*, 416 F. Supp. 3d 995 (C.D. Cal. 2019)
8 (finding that ICE violated the Fourth Amendment by systemically issuing detainers
9 to class members without probable cause).

10 6. I was also counsel in a class action challenging the lack of appointed
11 legal representatives for immigrants with serious mental abilities, *see Franco-*
12 *Gonzalez v. Holder*, Case No. 2:10-02211-DMG-DTB (C.D. Cal. 2011); a class
13 action raising constitutional and state law challenges to the Los Angeles Sheriff's
14 Department's practices with respect to detention of individuals pursuant to requests
15 from federal immigration officers, *see Roy v. County of Los Angeles*, No. 12-9012,
16 (C.D. Cal. 2012); and a class action challenging an Arizona state law that sought to
17 regulate immigration and criminalize the solicitation of day labor. *See Valle del Sol*
18 *v. Whiting*, No. CV-10-01061-PHX-SRB, 2015 WL 12030514, at *9 (D. Ariz.
19 Sept. 4, 2015).

20 7. In addition, I have represented immigrants in a number of non-class
21 cases raising complex legal issues. For example, I serve or have served as co-lead
22 counsel in *National TPS Alliance et al. v. Noem et al (NTPSA II)*, Case No. 25-cv-
23 05687 (N.D. Cal. 2025) (challenging termination of Temporary Protected Status
24 for over 60,000 immigrants from Honduras, Nepal, and Nicaragua); *National TPS*
25 *Alliance et al. v. Noem et al (NTPSA I)*, Case No. 25-cv-01766 (N.D. Cal. 2025)
26 (challenging termination of Temporary Protected Status for over one million
27 immigrants from Haiti and Venezuela); *Ramos v. Nielsen*, Case No. 18-cv-01554
28 (N.D. Cal. 2018) (challenging the termination of Temporary Protected Status for

1 over 400,000 immigrants from El Salvador, Haiti, Honduras, Nepal, Nicaragua,
2 and Sudan); and *Puente v. Arpaio*, Case No. CV-14-01356 (D. Ariz. 2014)
3 (challenging worksite raids in Maricopa county on constitutional grounds).

4 8. My colleague and proposed class counsel, Lauren Michel Wilfong, is
5 an immigrants' rights litigator at NDLON. Mx. Wilfong graduated *cum laude* from
6 New York University School of Law in 2021. Following graduation, they
7 completed a two-year Justice Catalyst legal fellowship at Justice Action Center
8 (JAC), a nonprofit organization that brings impact litigation to advance immigrant
9 rights. They joined NDLON in 2023 as a Staff Attorney, where they continue to
10 specialize in immigrant rights. Mx. Wilfong is a member in good standing of the
11 bars of New York and New Jersey, and is admitted to practice before several
12 federal courts, including the District of New Jersey, the Southern District of New
13 York, the Western District of New York, the District of the District of Columbia,
14 and the United States Court of Appeals for the Ninth Circuit.

15 9. Mx. Wilfong has substantial experience litigating complex
16 immigrants' rights cases in federal court, representing individuals and
17 organizations with large memberships. For example, they serve as counsel in
18 *National TPS Alliance et al. v. Noem et al. (NTPSA II)*, Case No. 25-cv-05687
19 (N.D. Cal. 2025) (challenging termination of Temporary Protected Status for over
20 60,000 immigrants from Honduras, Nepal, and Nicaragua); *National TPS Alliance*
21 *et al. v. Noem et al. (NTPSA I)*, Case No. 25-cv-01766 (N.D. Cal. 2025)
22 (challenging termination of Temporary Protected Status for over one million
23 immigrants from Haiti and Venezuela).

24 10. They previously served as counsel in *Haitian Bridge Alliance et al. v.*
25 *U.S. Department of Homeland Security et al.* (D.D.C. 2021) (putative class action
26 challenging Title 42 process and DHS's Haitian Deterrence Policy); *Texas v. U.S.*
27 *Department of Homeland Security*, No. 6:23-cv-00007 (S.D.TX. 2023)
28 (representing intervenor-defendants defending against states' challenge of the

1 Cuba, Haiti, Nicaragua, and Venezuela humanitarian parole processes); and
2 *Immigrant Defenders Law Center et al. v. U.S. Department of Homeland Security*
3 *et al.*, 2:21-cv-00395-FMO-RAO (C.D. Cal. 2021) (challenging policy denying
4 unaccompanied children subjected to the Migrant Protection Protocols program of
5 their rights under the Trafficking Victims Protection Reauthorization Act). Mx.
6 Wilfong also served as counsel in several Freedom of Information Act lawsuits,
7 including *Haitian Bridge Alliance et al. v. U.S. Department of Homeland Security*
8 *et al.*, No. 1:22-cv-08344-ER (S.D.N.Y. 2022) (seeking documents regarding the
9 treatment of Haitian immigrants detained in Del Rio, Texas in 2021) and *Robert F.*
10 *Kennedy Human Rights et al. v. U.S. Immigration and Customs Enforcement*, No.
11 1:22-cv-00929-LJV-HKS (W.D.N.Y. 2022) (seeking documents regarding policies
12 and conditions of confinement at an immigration detention center).

13 11. NDLON has capacity to thoroughly and vigorously litigate the claims
14 in this case and properly represent the plaintiff class, alongside our proposed class
15 co-counsel, and intends to commit all necessary resources to do so. If appointed
16 class counsel, I will ensure that Mx. Wilfong and I zealously represent the interests
17 of the class to the best of our collective ability.

18
19 I declare under penalty of perjury under the laws of the State of California and the
20 United States that the foregoing is true and correct.

21
22 Executed this 5th day of August, 2025 at Los Angeles, California.

23
24 /s/Jessica Karp Bansal

25 JESSICA KARP BANSAL
26
27
28

EXHIBIT 6

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*
17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

Counsel for Stop/Arrest Plaintiffs

(Additional counsel listed on next page)

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

Pedro VASQUEZ PERDOMO; Carlos
Alexander OSORTO; and Isaac
VILLEGAS MOLINA; Jorge
HERNANDEZ VIRAMONTES;
Jason Brian GAVIDIA; LOS
ANGELES WORKER CENTER
NETWORK; UNITED FARM
WORKERS; COALITION FOR
HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

DECLARATION OF REBECCA BROWN IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

- 1 JACOB S. KREILKAMP (SBN 248210)
2 *jacob.kreilkamp@mto.com*
3 JAMIE LUMA (SBN 331610)
4 *jamie.luma@mto.com*
5 SARA H. WORTH (SBN 341088)
6 *sara.worth@mto.com*
7 HENRY D. SHREFFLER (SBN 343388)
8 *henry.shreffler@mto.com*
9 MAGGIE BUSHELL (SBN 354048)
10 *maggie.bushell@mto.com*
11 KYLE A. GROVES (SBN 358085)
12 *kyle.groves@mto.com*
13 MUNGER, TOLLES & OLSON LLP
14 350 S. Grand Ave., 50th Floor
15 Los Angeles, CA 90071
16 Tel: 213-683-9100; Fax: 213-683-9100
17 *Counsel for Stop/Arrest Plaintiffs*
- 18 JESSICA K. BANSAL (SBN 277347)
19 *jessica@ndlon.org*
20 LAUREN MICHEL WILFONG*
21 *lwilfong@ndlon.org*
22 NATIONAL DAY LABORER
23 ORGANIZING NETWORK
24 1030 S. Arroyo Parkway, Suite 106
25 Pasadena, CA 91105
26 Tel: 626-214-5689
27 *Counsel for Stop/Arrest Plaintiffs*
- 28 BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493
Counsel for Stop/Arrest Plaintiffs
- BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199
Counsel for Stop/Arrest Plaintiffs
- MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883
Counsel for Access/Conditions Plaintiffs
- EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174
Counsel for Plaintiff United Farm Workers
- CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025
*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*
- ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999
*Counsel for Plaintiff Immigrant
Defenders Law Center*
- * Admitted pro hac vice

**DECLARATION OF REBECCA BROWN IN SUPPORT OF PLAINTIFFS’
MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS
COUNSEL**

I, Rebecca Brown, of full age, do hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and duly admitted to appear before the United States District Court for the Central District of California. I have personal knowledge of the matters set forth in this Declaration.

2. I, along with my colleagues Mark Rosenbaum, Ritu Mahajan, Gina Amato, and Sophia Wrench (collectively, the “Public Counsel Team”), represent Plaintiffs and the proposed classes in this matter. I respectfully submit this Declaration in support of Plaintiffs’ Motion for Class Certification and Appointment of Class Counsel for the purpose of setting forth the Public Counsel Team’s qualifications in the areas of immigration law, complex litigation, and class action litigation.

3. I work as a strategic litigation and policy Supervising Attorney in the Immigrants’ Rights Project (“IRP”) at Public Counsel, located at 610 S. Ardmore Avenue, Los Angeles, CA 90005. I oversee impact litigation on behalf of immigrant children and families.

4. Public Counsel, based in Los Angeles, is a non-profit public interest law firm dedicated to advancing civil rights and racial and economic justice, amplifying the power of its clients through comprehensive legal advocacy. Founded in 1970 and strengthened by a pro bono legal service model, Public Counsel’s staff and volunteers seek justice through direct legal services, promote healthy and resilient communities through education and outreach, and support community-led efforts to transform unjust systems in and beyond Los Angeles. Public Counsel’s IRP provides pro bono placement, support, and direct representation to immigrants, including unaccompanied minors, asylum seekers, detained immigrants, and survivors of serious crime and human trafficking, and currently represents hundreds of individuals seeking humanitarian immigration relief. We also engage in appellate representation before the Board of Immigration Appeals (“BIA”) and the U.S. Court of Appeals for

1 the Ninth Circuit (“Ninth Circuit”). Public Counsel regularly engages in immigration
2 litigation in federal courts related to the Administrative Procedure Act, and
3 constitutional law violations. *See, e.g., Flores v. Sessions*, CV 85-4544-DMG
4 (challenging the federal government’s family separation policy on constitutional
5 grounds), *J.L. v. Cuccinnelli*, CV 18-4914 (challenging the federal government’s
6 policy which resulted in denials of Special Immigrant Juvenile Status (“SIJS”) to
7 petitioners in California), *Franco v. Holder*, CV 10-02211 DMG (a class action
8 lawsuit on behalf of hundreds of immigration detainees in California, Arizona, and
9 Washington who suffer from severe mental disabilities), and *Regents of the University*
10 *of California v. DHS*, 18-15068 (challenging DHS’s decision to end the Deferred
11 Action for Childhood Arrivals program). In fact, Public Counsel has been at the
12 forefront of past and current federal immigration class action litigation.

13 5. The Plaintiffs and class members in this case lack sufficient resources to
14 pursue litigation on an individual basis as most are from indigent backgrounds.
15 Plaintiffs and class members are community members who have been racially profiled
16 and subjected to immigrant arrest and detention. Plaintiffs’ counsel has no conflict
17 of interest with the class members in this litigation. Plaintiffs’ counsel routinely
18 represents Plaintiffs like the ones represented in this case.

19 6. I have worked in immigration law for fifteen years. I am a 2011 graduate
20 of Franklin University Switzerland with a BA in International Relations. I am a 2022
21 graduate of Loyola Law School, Los Angeles where I served on *Loyola of Los Angeles*
22 *Law Review*. My article on “sanctuary” laws, immigration law, and recommendations
23 for comprehensive reform was published and I received a degree concentration in
24 Immigrant Advocacy. Prior to law school, I served at Central American Legal
25 Assistance from 2012-2019 in Brooklyn, New York and was a Department of Justice
26 Accredited Representative. As a DOJ Accredited Representative, I represented
27 hundreds of indigent noncitizens seeking humanitarian relief before the immigration
28 courts and USCIS.

1 7. Since 2022, my work has focused on , and building capacity among other
2 representatives of, noncitizens in immigration matters, with particular emphasis on
3 humanitarian relief. In 2022, I was selected as the Loyola Law Public Interest Fellow
4 within IRP. From 2022 to 2023, my fellowship focused specifically on providing
5 representation to children eligible for humanitarian relief and expanding access to
6 counsel for immigrant communities. In 2023, I transitioned to Interim Supervising
7 Staff Attorney of the Unaccompanied Children's Team, where I supervised a team of
8 12 attorneys, social workers, and paralegals serving approximately 200
9 unaccompanied children seeking asylum and other relief. In 2024, I became
10 responsible for constructing and enacting strategic litigation and policy for IRP. I
11 have authored and co-authored numerous amicus briefs on immigration law,
12 coordinated with state and federal lawmakers to draft legislation to benefit immigrant
13 communities, and been asked to speak publicly on issues affecting immigrants. I have
14 served as a guest lecturer at the University of California, Los Angeles Luskin School
15 of Public Affairs.

16 8. During my time at Public Counsel, I have litigated cases on behalf of
17 immigrants before immigration judges, the BIA, federal district courts, the Ninth
18 Circuit, and the California state courts. I am a member of the Bar of the State of
19 California, and admitted to practice before several federal courts, including the
20 Northern District of California, the Central District of California, and the United
21 States Court of Appeals for the Ninth Circuit.

22 9. I serve as co-counsel in complex federal civil rights actions, including
23 class actions, on behalf of noncitizens, including *A.C.R. v. Noem*, No. 1:25-cv-03962
24 (E.D.N.Y. filed July 17, 2025) (class action) and *J.P. et al. v. USA*, No.
25 2:2022cv00683 (D. Ariz. 2023). Recently, I was awarded the *Daily Journal's*
26 California Lawyer Attorney of the Year Award, in recognition of my work on *J.P. et*
27 *al v. USA*.

1 10. Throughout these cases, I have distinctive knowledge and specialized
2 skill in the area of immigrants' rights litigation in federal courts, class action litigation
3 on behalf of low-income clients, and complex civil rights litigation, as well as the
4 intersection between immigration, civil rights, and impact litigation.

5 11. Mark Rosenbaum is Public Counsel's Senior Special Counsel for
6 Strategic Litigation.

7 12. Mr. Rosenbaum was admitted to the practice of law in the State of
8 California in the Spring of 1974, and has subsequently been admitted to practice
9 before the United States Supreme Court, the United States Court of Appeals for the
10 Ninth Circuit, the United States District Court of the Central, Northern and Eastern
11 Districts of California, and the United States Court of Military Appeals. He has
12 argued on four occasions before the United States Supreme Court and three occasions
13 before the California Supreme Court, and on one occasion before the Court of Military
14 Appeals. He has argued on multiple occasions before the Ninth Circuit Court of
15 Appeals, and has tried cases or otherwise appeared in cases throughout California, as
16 well as before the United States District Courts for the District of Oregon and the
17 District of Columbia.

18 13. Mr. Rosenbaum graduated from Harvard Law School in February of
19 1974. Before joining Public Counsel, Mr. Rosenbaum worked at the ACLU
20 Foundation of Southern California for over 40 years, most recently as Chief Counsel,
21 and prior to that, as Legal Director for 15 years. Mr. Rosenbaum is a visiting professor
22 at the University of California, Irvine School of Law where he teaches courses in
23 constitutional law and public interest litigation. He has also taught at the University
24 of Michigan, University of Southern California, University of California, Los
25 Angeles, Loyola, and Harvard law schools.

26 14. Mr. Rosenbaum is or has been one of the lead counsel or lead counsel in
27 numerous class action cases, including statewide state and federal class action cases
28 in state and federal court. Many of those cases have concerned immigration and civil

rights. To take only a few examples, Mr. Rosenbaum is or was lead counsel or one of the lead counsel in the following cases:

- a. *Orantes-Hernandez v. Smith*, 541 F. Supp. 351 (C.D. Cal. 1982) (requiring a notice of asylum rights for detained Salvadorans)
- b. *DHS v. Regents of the University of California*, 591 U.S. 1 (2020) (blocking the Trump Administration's rescission of the DACA program)
- c. *Garza v. Board of Supervisors*, 918 F.2d 763 (9th Cir.1990) (ending over a century of Latino discrimination in the districting of the Los Angeles County Board of Supervisors)
- d. *J.P. v. Barr*, No. 2:18-cv-6081-JAK (SKx) (C.D. Cal. Jan. 17, 2020) (providing mental health assistance to families separated as a consequence of the Trump Administration's "Zero Tolerance" policy)
- e. *Perez-Funez v. INS* (appointing counsel for minors in immigration detention cases)

15. Mr. Rosenbaum has received numerous awards in including the ACLU Lifetime Achievement Award, *Daily Journal's* California Lawyer Attorney of the Year Award in Civil Rights (2010, 2005), Clarence Darrow Award, NAACP H. Claude Hudson Award, Western Center for Law and Poverty Achievement Award, Cruz Reynoso Award, La Raza Legal Alliance Community Service Award, Sholem Social Justice Award. He has also been recognized in the media, including being named one of the 500 best attorneys in the United States by *Lawdragon* Magazine, and one of the "100 Most Influential Attorneys in California" by the Los Angeles Daily Journal each year since the award's inception in 1998.

16. Also counsel on this case is Ritu Mahajan, Directing Attorney of Public Counsel's Community Development Project. Ms. Mahajan graduated from UC Berkeley School of Law in 2007. She has worked with community small businesses and nonprofits providing health care, affordable housing, education and social services in the Los Angeles area for fifteen years.

1 17. Ms. Mahajan was named a *Daily Journal's* California Lawyer Attorney
2 of the Year for her work on the landmark settlement in *Community Power Collective*
3 *v. City of Los Angeles*. Her work on that matter focused on upholding the rights of
4 sidewalk vendors — many of whom are immigrants—that were subject to illegal
5 vending bans in the City of Los Angeles

6 18. Sophia Wrench is an attorney with the Community Development Project
7 and Immigrants' Rights Project at Public Counsel. She graduated LMU Loyola Law
8 School, Los Angeles in 2023 and was admitted to practice law in California in January
9 2024. She is admitted to practice before the Central and Northern Districts of
10 California. She began at Public Counsel through an Equal Justice Works fellowship
11 where she worked on creating policy change for immigrant communities, passing
12 sanctuary city laws, and providing technical assistance and direct legal support to
13 street vendors and immigrants across California. In 2025, she was also named a *Daily*
14 *Journal's* California Lawyer Attorney of the Year for her work on the landmark
15 settlement in *Community Power Collective v. City of Los Angeles*. Ms. Wrench has
16 served immigrant communities in California in various legal and non-legal support
17 roles for over ten years, including as a child advocate for unaccompanied immigrant
18 children, working with low-income immigrant parents for social services and resource
19 navigation, and engaging in grassroots organizing and community education.

20 19. Lastly, Gina Amato is the Directing Attorney of the Immigrants' Rights
21 Project at Public Counsel. Ms. Amato has over twenty years of experience in
22 immigration law, advocating for underserved immigrants in their humanitarian
23 immigration matters, and engaging in policy advocacy and strategic litigation to
24 advance and protect the rights of immigrant communities. Prior to stepping into the
25 Directing Attorney role, Ms. Amato led IRP's Survivor Team for nearly fifteen years,
26 where she specialized in working with immigrant survivors of serious crime and
27 human trafficking. Ms. Amato also served as an Adjunct Professor at LMU Loyola
28 Law School's Immigrant Justice Clinic for six years, where she taught Loyola law

1 students the practice of humanitarian immigration law and mentored them in the
2 representation of clients in their immigration matters.

3 20. Ms. Amato has also been recognized for her litigation and advocacy
4 efforts in strategic litigation on behalf of immigrants. She represented a domestic
5 violence survivor in a federal lawsuit, *Ruiz Pozuelos v. Mayorkas*, challenging an
6 adverse decision under the Administrative Procedure Act – a case that earned her the
7 *Daily Journal's* California Lawyer Attorney of the Year Award in 2024. Ms. Amato
8 also received the Kathleen Kim & Kebok Foundation Community Impact Award in
9 2022, in recognition of her enduring work on behalf of immigrant communities.

10 21. Prior to joining Public Counsel in 2008, Ms. Amato was a litigation
11 associate at Schonbrun DeSimone Seplow Harris & Hoffman, LLP, where she
12 represented a group of journalists and community members in *MIWON v. City of Los*
13 *Angeles*, a federal class action lawsuit against the Los Angeles Police Department for
14 using excessive force at the May Day rally in 2007.

15 22. Ms. Amato graduated from U.C. Berkeley in 2001 with a Juris Doctor
16 from Berkeley Law and a Master's Degree in Public Policy from the Goldman School
17 of Public Policy. While in law and graduate school, Ms. Amato worked for a number
18 of immigrants' rights organizations and engaged in grass-roots organizing and
19 community education, in addition to providing direct legal services to asylum seekers.

20 23. Public Counsel has several other attorneys with substantial experience in
21 class action and complex federal litigation with whom we regularly consult. Although
22 we are not seeking appointment of these individuals as class counsel, their continued
23 consultation will provide valuable assistance in this matter and further the interests of
24 Plaintiffs and members of the class.

25 24. I have distinctive knowledge and specialized skill in the area of
26 immigration-related litigation in the federal courts and SIJS in particular and will
27 adequately and fairly represent the interests of the class.
28

1 25. Public Counsel has not received nor will it receive reimbursement from
2 the individual Plaintiffs or class members in this case. Public Counsel has committed
3 to representing Plaintiffs and members of the proposed class on a pro bono basis, to
4 deploy required resources in support of this litigation, and to litigate this case to
5 resolution.

6 Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above
7 statements are true and correct.

8
9 August 5, 2025

s/ 
Rebecca Brown

EXHIBIT 7

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitran@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmere Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

Pedro VASQUEZ PERDOMO; Carlos
Alexander OSORTO; and Isaac
VILLEGAS MOLINA; Jorge
HERNANDEZ VIRAMONTES;
Jason Brian GAVIDIA; LOS
ANGELES WORKER CENTER
NETWORK; UNITED FARM
WORKERS; COALITION FOR
HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF PEDRO
VASQUEZ PERDOMO IN SUPPORT
OF CLASS CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

JACOB S. KREILKAMP (SBN
248210)
jacob.kreilkamp@mto.com
JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
SARA H. WORTH (SBN 341088)
sara.worth@mto.com
HENRY D. SHREFFLER (SBN
343388)

henry.shreffler@mto.com
MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43066
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF PEDRO VASQUEZ PERDOMO

I, Pedro Vasquez Perdomo, declare the following based on my personal knowledge:

1. I make this declaration from my personal knowledge and if called to testify to these facts could and would do so competently.

2. My full name is Pedro Vasquez Perdomo. I am 54 years old. I am of Latino ethnicity.

3. I have lived in Pasadena for decades, since I was a young man. I have worked as a day laborer all around Los Angeles. I have diabetes that I work with my doctor to manage.

4. On June 18, 2025 I arrived at the bus stop near the corner of Orange Grove Boulevard and Los Robles Avenue at 5:30am. I sat on a bench and waited with several of my co-workers to be picked up for a construction job. We were waiting for our ride and having some coffee.

5. Suddenly, several cars pulled up. One crossed in front of us and stopped to our right. A second car stopped in front of us, with another car behind it. The first three cars were large and black with tinted windows. They had no markings on them. A fourth unmarked car I saw only later.

6. I started to say that the cars looked weird, but then the doors opened and men in masks with guns started running toward us. They were wearing regular clothes. They had vests on but no visible badges, and they did not identify themselves. I thought it was probably immigration, but I could not be sure because no one identified themselves.

7. I was afraid. It felt like a kidnapping. I tried to move away but I was immediately surrounded by several men with guns. They grabbed me and quickly handcuffed me. After I was handcuffed, one of the men asked for identification. I said in English "I have the right to remain silent."

8. The men put me into a car, still handcuffed. They drove a few blocks

1 to a nearby CVS parking lot. They took me out of the car and again asked if I had
2 any identification. I pointed to my pocket and they started to go through my
3 pockets. They pulled out my wallet and found my expired foreign consular ID.
4 Though I was already handcuffed, they put chains on me: on my feet, waist and
5 hands. It made me feel horrible, like I wasn't human. Like I was a criminal. I was
6 in shock. I was never told why I was being arrested and the officers never said
7 where they were from. They never showed me a warrant or said that they had a
8 warrant for my arrest.

9 9. They put us back in the cars and drove me to a detention center in Los
10 Angeles. They took my fingerprints and photo. Then they put me in a room with
11 52 other people. It was very crowded and cold. They gave us very little to eat and
12 drink. There were no beds or mattresses. We had to sleep on cement benches or
13 on the floor, if we could manage to sleep at all. There were two toilets in the
14 room but only one was working. The floor surrounding the toilet was covered in
15 urine. We asked the officers for supplies so that we could clean the bathroom
16 because it was unhygienic, but they ignored us. There was no way to use the
17 bathroom without ruining the makeshift paper shoes they made us wear. I was
18 lucky because I was only there 1.5 days. I met people who had been there for
19 three days and counting.

20 10. I was then moved to the detention center in Adelanto. I was shackled
21 again at my waist, feet and hands when they moved me.

22 11. While I was detained I felt increasingly ill. The food and drinks they
23 provided were not healthy. They gave very little food, and it came at random
24 times. I take daily medication to manage my diabetes, but it was disrupted when I
25 was detained. I was unable to manage my blood sugar levels in detention. I did
26 not receive a doctor visit until my sixth day in detention.

27 12. While I was detained, I also got an eye infection. My eye was bright
28 red. It was very painful and my eye was tearing up and excreting crust. When I
received my diabetes medication, the nurse noticed and said it looked very bad.

1 She wrote a note that I should receive medical care for it, but I did not receive
2 further care.

3 13. I was placed in deportation proceedings. After a bond hearing, I was
4 granted bond by an immigration judge on July 3rd, more than two weeks after I
5 was detained. My family attempted to pay the bond that day, but were told it was
6 too late to make the payment and the office was closed until July 7th. They were
7 finally able to pay bond the morning of July 7th. However I was not released
8 until the night of July 8th.

9 14. I have felt sad and desperate and depressed during this whole process.
10 I think that I was arrested that day at the bus stop because of how I look. I was
11 sitting with other workers and we all look Hispanic and were wearing
12 construction work clothes. While I am glad that I am no longer detained, I live in
13 fear of being stopped again for the same reasons. I feel anxious and I avoid
14 leaving the house unnecessarily. I remain traumatized by what happened to me,
15 but I am working to overcome it each day.

16 15. I plan on returning to work as a day laborer and to use the nearby
17 Pasadena bus stops near the corner of Orange Grove Boulevard and Los Robles
18 Avenue.

19 16. I understand I am a plaintiff in this class-action lawsuit. I understand my
20 responsibility and role as a representative for the class. I understand that I need to
21 stay informed with what is happening in the case and that I need to think about
22 the interests of other class members and act on those interests. I am prepared to
23 represent the class in this case and will take seriously my responsibilities in
24 connection with that representation.

1 I declare under penalty of perjury of the laws of the State of California and
2 the United States that the foregoing is true and correct. Executed at Pasadena,
3 California on August 7, 2025



6 Pedro Vasquez Perdomo

7
8
9 Certificate of Interpretation

10
11 I, Mariano Barrera, am competent to interpret between the English and
12 Spanish languages. I certify that I read the attached "Declaration of Pedro
13 Vasquez Perdomo" to Pedro Vasquez Perdomo in the Spanish language and that
14 he understood it and agreed that it was true and accurate before signing. I certify
15 that my interpretation of the attached document was true and accurate to the best
16 of my abilities.

17
18
19 M B

20 Mariano Barrera
21 Law Offices of Stacy Tolchin
22 776 E. Green Street, Suite 210
23 Pasadena, CA 91101
24 (213) 622-7450

08/07/2025

25 Date

EXHIBIT 8

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 Pedro VASQUEZ PERDOMO; Carlos
20 Alexander OSORTO; and Isaac
21 VILLEGAS MOLINA; Jorge
22 HERNANDEZ VIRAMONTES;
23 Jason Brian GAVIDIA; LOS
24 ANGELES WORKER CENTER
25 NETWORK; UNITED FARM
26 WORKERS; COALITION FOR
27 HUMANE IMMIGRANT RIGHTS;
28 IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF ISAAC
VILLEGAS MOLINA IN SUPPORT
OF CLASS CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

1 JACOB S. KREILKAMP (SBN
2 248210)
3 jacob.kreilkamp@mto.com
4 JAMIE LUMA (SBN 331610)
5 jamie.luma@mto.com
6 SARA H. WORTH (SBN 341088)
7 sara.worth@mto.com
8 HENRY D. SHREFFLER (SBN
9 343388)
10 henry.shreffler@mto.com
11 MAGGIE BUSHELL (SBN 354048)
12 maggie.bushell@mto.com
13 KYLE A. GROVES (SBN 358085)
14 kyle.groves@mto.com
15 MUNGER, TOLLES & OLSON LLP
16 350 S. Grand Ave., 50th Floor
17 Los Angeles, CA 90071
18 Tel: 213-683-9100; Fax: 213-683-9100

19 *Counsel for Stop/Arrest Plaintiffs*

20 JESSICA K. BANSAL (SBN 277347)
21 jessica@ndlon.org
22 LAUREN MICHEL WILFONG*
23 lwilfong@ndlon.org
24 NATIONAL DAY LABORER
25 ORGANIZING NETWORK
26 1030 S. Arroyo Parkway, Suite 106
27 Pasadena, CA 91105
28 Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF ISAAC VILLEGAS MOLINA

I, Isaac Antonio Villegas Molina, declare the following based on my personal knowledge:

1. I make this declaration from my personal knowledge and if called to testify to these facts could and would do so competently.

2. My full name is Isaac Antonio Villegas Molina. I am 47 years old. I have lived in Los Angeles County for about 13 years. I am of Latino ethnicity.

3. From about 2006-2009 I worked as a crew member for an American cruise ship. In 2010 I won a scholarship to study culinary arts and English in Florida. I have lived in Los Angeles County for the last 13 years and worked in restaurants across Los Angeles. However, it has been increasingly hard to find work. Recently, I started working as a day laborer in construction.

4. On June 18, 2025 I was waiting with my co-workers to be picked up for a construction job. I was standing by a bus stop in front of Winchell's Donuts on Los Robles Avenue and Orange Grove Boulevard. It was shortly before 6am.

5. Suddenly, I saw three vehicles pulled up. About five men came running out very aggressively. They were wearing masks and they had guns. They were wearing regular clothes, plus vests. They did not identify themselves. I thought we were being kidnapped. They went in all directions, chasing and grabbing my friends. I stood still. I saw how rough they were being with the others. I tried to stay calm.

6. One of the men came up to me and yelled "don't run!" I said calmly "I'm not going to run" in English. Once he said that, I knew I could not move and had to stay in place. He was masked, aggressive, and armed. I was afraid to move. He demanded to see my ID and I showed him my California Driver's License. He asked me if I had any papers and I said no. He asked me why I didn't apply for papers, it seemed like he was making fun of me. He did not ask me any other questions after that. He handcuffed me and placed me in one of the

1 unmarked vehicles. He never told me he was an immigration official. I was never
2 told that there was any warrant for my arrest, and no one showed me an arrest
3 warrant.

4 7. They drove us a few blocks to a CVS parking lot. They took us out of
5 the cars. One of the men had a big military-style gun and was agitated, acting
6 tough. He yelled at me, "what's in your pocket!" as if it was something
7 dangerous, but it was just candy. My hands were handcuffed behind my back but
8 he acted like we were somehow a danger.

9 8. Then they shackled us all on our feet, waist, and wrists. It was totally
10 unnecessary. It felt like they wanted us to feel a certain way. The whole thing felt
11 like a kidnapping.

12 9. They put me back in the car and took me to a detention center in Los
13 Angeles. I was there for three days sleeping on the floor, without a mattress and
14 almost nothing to eat. I remember thinking, what did I do to deserve this
15 treatment? I was just waiting for work. After three days, I was shackled again and
16 moved to Adelanto.

17 10. On July 7, after more than two weeks in detention, I was given a bond
18 hearing. An immigration judge granted me bond. I was released the next evening.
19 ICE did not return my driver's license when I was released.

20 11. I believe that we were targeted because of race. I look like an
21 immigrant. I look Hispanic.

22 12. My life was completely upended by this experience. I lost my
23 construction job while I was detained. I lost my identification. I almost lost my
24 housing. I am starting over.

25 13. I am worried that I will get arrested again for the same reasons as
26 before. I will get targeted again just because I look like an immigrant.

27 14. I plan on returning to work and to use public transportation and my
28 bicycle in Pasadena and I still often go near the corner of Orange Grove
Boulevard and Los Robles Avenue.

1 15. I understand I am a plaintiff in this class-action lawsuit. I understand
2 my responsibility and role as a representative for the class. I understand that
3 I need to stay informed with what is happening in the case and that I need to
4 think about the interests of other class members and act on those interests. I
5 am prepared to represent the class in this case and will take seriously my
6 responsibilities in connection with that representation.

7
8
9 I declare under penalty of perjury of the laws of the State of California and
10 the United States that the foregoing is true and correct. Executed at Pasadena,
11 California on August 7, 2025

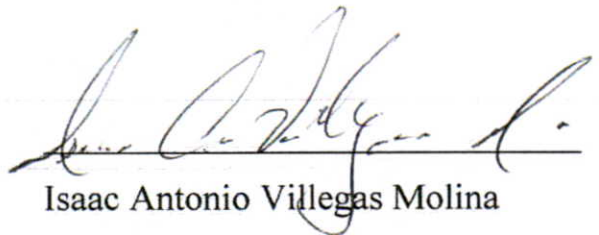
12
13 
14 Isaac Antonio Villegas Molina

EXHIBIT 9

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrana@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*
17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JORGE LUIS
HERNANDEZ VIRAMONTES IN
SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

1 JACOB S. KREILKAMP (SBN
248210)
2 jacob.kreilkamp@mto.com
3 JAMIE LUMA (SBN 331610)
4 jamie.luma@mto.com
5 SARA H. WORTH (SBN 341088)
6 sara.worth@mto.com
7 HENRY D. SHREFFLER (SBN
8 343388)

9 henry.shreffler@mto.com
10 MAGGIE BUSHELL (SBN 354048)
11 maggie.bushell@mto.com
12 KYLE A. GROVES (SBN 358085)
13 kyle.groves@mto.com
14 MUNGER, TOLLES & OLSON LLP
15 350 S. Grand Ave., 50th Floor
16 Los Angeles, CA 90071
17 Tel: 213-683-9100; Fax: 213-683-9100

18 *Counsel for Stop/Arrest Plaintiffs*

19 JESSICA K. BANSAL (SBN 277347)
20 jessica@ndlon.org
21 LAUREN MICHEL WILFONG*
22 lwilfong@ndlon.org
23 NATIONAL DAY LABORER
24 ORGANIZING NETWORK
25 1030 S. Arroyo Parkway, Suite 106
26 Pasadena, CA 91105
27 Tel: 626-214-5689

28 *Counsel for Stop/Arrest Plaintiffs*

29 BREE BERNWANGER (SBN 331731)
30 bbernwanger@aclunc.org
31 AMERICAN CIVIL LIBERTIES
32 UNION FOUNDATION OF
33 NORTHERN CALIFORNIA
34 39 Drumm Street
35 San Francisco, CA 94111
36 Tel: 415-621-2493

37 *Counsel for Stop/Arrest Plaintiffs*

38 BRISA VELAZQUEZ OATIS
(SBN 339132)
39 bvoatis@aclu-sdic.org
40 ACLU FOUNDATION OF
41 SAN DIEGO & IMPERIAL
42 COUNTIES
43 P.O. Box 87131
44 San Diego, CA 92138-7131
45 Tel: 619-398-4199

46 *Counsel for Stop/Arrest Plaintiffs*

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilascho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

SECOND DECLARATION OF JORGE LUIS HERNANDEZ VIRAMONTES

I, Jorge Luis Hernandez Viramontes, declare as follows:

1. I make this declaration from my own personal knowledge. If called, I could and would competently testify to the contents herein.

2. I continue to reside in Baldwin Park, California, and continue to work at the carwash in Whittier, California, where I have worked for approximately 10 years. My wife, children, and I rely on my income from my job as a manager at the carwash to support ourselves and I go to work at the carwash almost every day.

3. The reason I said that I felt targeted due to my accent, in addition to other factors, on June 18, 2025 is that some other co-workers who were also questioned by agents that day who did not have an accent were questioned only about their citizenship. I was questioned about my citizenship, but after I told the agent interrogating me that I was a U.S. citizen, he persisted and asked where I was born. I explained that I was a dual citizen but the agents still took me since I didn't have my passport.

4. I continue to fear that I will encounter agents in the future and that they will stop and investigate me all over again. Since the incident on June 18, 2025, I have applied for a passport card and carry the card with me at all times because I worry that I will have to face agents again.

5. I understand that I am a plaintiff in a class action lawsuit challenging the suspicionless stop practices of immigration agents. I understand my responsibilities and role as a representative for the class and that I need to think about the interests of other class members and not just my own. I am willing to serve as a representative of the class and take this responsibility seriously. I am not aware of any conflicts of interest with other class members.

1 I declare under penalty of perjury of the laws of the United States that the above
2 information is true and correct to the best of my knowledge.

3
4 Executed on August 5, 2025 at Baldwin Park, California.

5 
6 _____
Jorge Luis Hernandez Viramontes

EXHIBIT 10

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrana@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**

19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JASON BRIAN
GAVIDIA IN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

1 JACOB S. KREILKAMP (SBN
2 248210)
3 jacob.kreilkamp@mto.com
4 JAMIE LUMA (SBN 331610)
5 jamie.luma@mto.com
6 SARA H. WORTH (SBN 341088)
7 sara.worth@mto.com
8 HENRY D. SHREFFLER (SBN
9 343388)
10 henry.shreffler@mto.com
11 MAGGIE BUSHELL (SBN 354048)
12 maggie.bushell@mto.com
13 KYLE A. GROVES (SBN 358085)
14 kyle.groves@mto.com
15 MUNGER, TOLLES & OLSON LLP
16 350 S. Grand Ave., 50th Floor
17 Los Angeles, CA 90071
18 Tel: 213-683-9100; Fax: 213-683-9100

19 *Counsel for Stop/Arrest Plaintiffs*

20 JESSICA K. BANSAL (SBN 277347)
21 jessica@ndlon.org
22 LAUREN MICHEL WILFONG*
23 lwilfong@ndlon.org
24 NATIONAL DAY LABORER
25 ORGANIZING NETWORK
26 1030 S. Arroyo Parkway, Suite 106
27 Pasadena, CA 91105
28 Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilascho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

DECLARATION OF JASON BRIAN GAVIDIA

I, Jason Brian Gavidia, hereby declare:

I make this declaration based on my own personal knowledge. If called, I could and would competently testify hereto:

1. I stand by the statements made in my earlier declaration, dated June 30, 2025.

2. I continue to live and work in Los Angeles County. In addition, I have continued to and will continue to rent space at Yank Towing, located in Montebello, California. Yank Towing is the tow yard, junk car removal, and storage lot where Border Patrol agents stopped, interrogated, and mistreated me on June 12, 2025. I will continue to visit Yank Towing, and I am concerned that I will be racially profiled again for my skin color and appearance.

3. I understand that I am a plaintiff in this class-action lawsuit. I understand my responsibility and role as a representative for the class. I understand that I need to stay informed about what is happening in the case and that I need to think about the interests of other class members and act on those interests. I am not aware of any relevant conflicts of interest between me and other members of the class. I am prepared to represent the class in this case and will take seriously my responsibilities in connection with that representation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 7, 2025 in Los Angeles, California.



Jason Brian Gavidia

EXHIBIT 11

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*
17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF ARMANDO
GUDINO IN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

1 JACOB S. KREILKAMP (SBN
2 248210)
3 ~~jacob.kreilkamp@mto.com~~
4 JAMIE LUMA (SBN 331610)
5 ~~jamie.luma@mto.com~~
6 SARA H. WORTH (SBN 341088)
7 ~~sara.worth@mto.com~~
8 HENRY D. SHREFFLER (SBN
9 343388)
10 ~~henry.shreffler@mto.com~~
11 MAGGIE BUSHELL (SBN 354048)
12 ~~maggie.bushell@mto.com~~
13 KYLE A. GROVES (SBN 358085)
14 ~~kyle.groves@mto.com~~
15 MUNGER, TOLLES & OLSON LLP
16 350 S. Grand Ave., 50th Floor
17 Los Angeles, CA 90071
18 Tel: 213-683-9100; Fax: 213-683-9100

19 *Counsel for Stop/Arrest Plaintiffs*

20 JESSICA K. BANSAL (SBN 277347)
21 ~~jessica@ndlon.org~~
22 LAUREN MICHEL WILFONG*
23 ~~lwilfong@ndlon.org~~
24 NATIONAL DAY LABORER
25 ORGANIZING NETWORK
26 1030 S. Arroyo Parkway, Suite 106
27 Pasadena, CA 91105
28 Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
~~bbernwanger@aclunc.org~~
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
~~bvoatis@aclu-sdic.org~~
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
~~mcraig@heckerfink.com~~
MACK E. JENKINS (SBN 242101)
~~mjenkins@heckerfink.com~~
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
~~eaguilascho@farmworkerlaw.com~~
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
~~cbergquist@chirla.org~~
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
~~ahuerta@immdef.org~~
BRYNNA BOLT (SBN 339378)
~~bbolt@immdef.org~~
ALISON STEFFEL (SBN 346370)
~~asteffel@immdef.org~~
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

1 I, Armando Gudino, declare:

2 1. I make this declaration from my personal knowledge and, if called to testify to
3 these facts, could and would do so competently.

4 2. I incorporate the information from my declaration submitted in support of
5 Plaintiffs' motion for a temporary restraining order.

6 3. I serve as the Executive Director of the Los Angeles Worker Center Network
7 ("LAWCN"). I have worked for LAWCN since 2022. The LAWCN has eight member
8 organizations, one of which is the Warehouse Worker Resource Center ("WWRC"). WWRC is
9 itself a membership organization which counts among its members low wage Latino workers.

10 4. Since I submitted my first declaration, I have learned more stories of individuals
11 who have been impacted negatively by the federal government's practice of illegally stopping
12 individuals throughout Southern California. I have also heard from my colleagues and staff at
13 member organizations that the workers we represent—all of whom are working class, and many
14 of whom are Latino—continue to be afraid that federal immigration agents will target them and
15 stop them illegally on the basis of their race, appearance, language, employment, or the locations
16 where they live and work. This includes both members who have been detained by immigration
17 agents based on these broad profiles, or members who have strong reason to fear they will be
18 detained in the future.

19 5. What follows is the experience of two members of LAWCN's constituent
20 organization WWRC, whom I refer to below using the pseudonyms "Rebecca" and "Laura." I
21 learned about their experiences after I submitted my first declaration in this case.

22 ***Rebecca***

23 6. I am aware of one Latina member of WWRC who lives in Los Angeles County,
24 "Rebecca." She has been a WWRC member for approximately two years, and has worked as a
25 day laborer in Los Angeles and San Bernardino counties during this time.

26 7. Rebecca lives nearby a Pomona Home Depot that was raided in late April 2025 by
27 federal immigration authorities. She regularly visits this Home Depot location and its adjacent
28 parking lot where the raid occurred because she buys her work products there. She also drives by

1 the Home Depot location regularly on her way to work. During this raid in late April, agents
2 grabbed and stopped a group of day laborers. She received news of the raid the same day while
3 she was on her way to work and while she was very close to the site. The news left her terrified
4 that she could be targeted simply for being in the area, wearing her work clothes, and appearing
5 Latina. She went home immediately and cancelled her job for the day. She stopped working for
6 two weeks afterwards due to fear that she would be stopped and detained by agents just because
7 of her appearance.

8 8. As a result of the Pomona Home Depot raid, and raids that have occurred at Home
9 Depot locations in and near her neighborhood (including another raid at the same Home Depot
10 location on June 17), she fears being stopped and detained by federal immigration agents based
11 on her race, her status as a day laborer, and her frequent presence at or near Home Depot
12 locations. She has also witnessed this fear taking over her entire neighborhood, which she
13 describes as a beautiful community that is predominantly Latino and which she reports has now
14 gone silent. She also has seen fear and trepidation in her son, a United States citizen who works in
15 construction who has told her that he fears being stopped and profiled because of his Latino
16 appearance and his visibility as a construction worker, and fears potentially losing his tools and
17 his truck. Rebecca has also talked to a United States citizen neighbor, who is also Latina, and who
18 is undergoing cancer treatments. The neighbor has told Rebecca that the neighbor's U.S. citizen
19 son, also Latino, has stopped accompanying her to medical appointments for fear that ICE may
20 stop and arrest them both based on their appearance.

21 9. Rebecca continues to work as a day laborer. However, she has altered her daily life
22 to minimize the risk of being stopped based on her appearance. She no longer visits Home Depot
23 and she avoids leaving the house unnecessarily because of her continued fear that her appearance,
24 employment as a day laborer, and proximity to Home Depot will place a target on her back for
25 illegal seizures at the hands of federal immigration authorities.

26 **Laura**

27 10. "Laura" is another WWRC member whose experiences I am familiar with. Laura
28 lives in San Bernardino County, and works at a packing factory. She has four United States

1 citizen children, three of whom are under 18. She lives and works in a working class, Latino
2 community in San Bernardino. During the past two months, Laura has seen immigration agents in
3 her neighborhood near where she lives and works, including some outside a parking lot of a local
4 theater in San Bernardino and at gas stations nearby. Her husband has also seen masked agents
5 whom he believed were immigration agents near his job site, also in San Bernardino. These
6 incidents have confirmed that immigration authorities have been targeting Laura's neighborhood,
7 and she understands that some of these incidents may have resulted in detentions of individuals
8 based solely on their race, the location where they were, and employment.

9 11. As a result of this illegal targeting, Laura fears she could be detained in the future
10 because she is aware and has heard that agents are racially profiling individuals of Latino decent
11 in her community. Because she identifies as Latina, her primary language is Spanish, the
12 neighborhood she lives in is predominantly Latino, and she understands that agents are not
13 focusing on those with criminal history but rather anyone they encounter during their operations,
14 she lives in tremendous fear that she or her family members will be stopped illegally by these
15 agents. She has also read from the Internet and in news reports, including in Telemundo, that
16 immigration agents are being rewarded with bonuses for detaining and arresting people, and this
17 has made her even more fearful that she and her family will be subject to unjustified stops.

18 12. These illegal stops have significantly upended Laura's life. She is scared to go out,
19 including to the grocery store. When she does visit the grocery store, she does so right before
20 closing, as late as she can, to avoid encountering immigration agents. She now fears taking her
21 three youngest children to school because agents may snatch her up there or on route. She is also
22 scared that there will be agents outside her work or at church, which is also in San Bernardino.
23 She has heard that there have been agents at churches in San Bernardino, including one person
24 taken from a church in Santa Elena and a few people arrested at the church she visits. These
25 agents entered Laura's church and grabbed people inside, including a U.S. citizen. Laura also
26 fears visiting family members in Los Angeles County, which she ordinarily would do. Together,
27 Laura has diminished how often she attends church services, how often she visits her family, and
28

1 how often she participates in other religious meetings (including meetings at multiple religious
2 organizations across Los Angeles County).

3 * * *

4 13. LAWCN's pursuit of this litigation is pertinent to the organization's mission and
5 LAWCN has no relevant conflicts of interest with its members.

6 14. LAWCN understands that it is serving as a plaintiff in a class-action lawsuit. We
7 understand the organization's responsibilities and role as a representative for the Suspicionless
8 Stop Class. We understand the need to stay informed with what is happening in the case and that
9 we need to think about the interests of other class members (both those that are LAWCN
10 members and those who are not) and act on those interests. We are prepared to represent the class
11 and will take seriously the organization's responsibilities in connection with that representation.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on August 7, 2025

15 Armando Gudino
Armando Gudino (Aug 7, 2025 08:37:28 PDT)

16 Armando Gudino
17
18
19
20
21
22
23
24
25
26
27
28

Second Declaration of Armando Gudino ISO MCC

Final Audit Report

2025-08-07

Created:	2025-08-07
By:	Mohammad Tajsar (MTajsar@aclusocal.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAcho9TesNwfgHJvjvq-a3sH-Nh09l1zZq

"Second Declaration of Armando Gudino ISO MCC" History







-  Document created by Mohammad Tajsar (MTajsar@aclusocal.org)
2025-08-07 - 2:53:19 PM GMT- IP address: 107.212.214.201
-  Document emailed to agudino@lawcnetwork.org for signature
2025-08-07 - 2:54:08 PM GMT
-  Email viewed by agudino@lawcnetwork.org
2025-08-07 - 3:36:46 PM GMT- IP address: 45.51.194.183
-  Signer agudino@lawcnetwork.org entered name at signing as Armando Gudino
2025-08-07 - 3:37:18 PM GMT- IP address: 45.51.194.183
-  Document e-signed by Armando Gudino (agudino@lawcnetwork.org)
Signature Date: 2025-08-07 - 3:37:20 PM GMT - Time Source: server- IP address: 45.51.194.183
-  Agreement completed.
2025-08-07 - 3:37:20 PM GMT

EXHIBIT 12

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

20 Pedro VASQUEZ PERDOMO; Carlos
21 Alexander OSORTO; and Isaac
22 VILLEGAS MOLINA; Jorge
23 HERNANDEZ VIRAMONTES;
24 Jason Brian GAVIDIA; LOS
25 ANGELES WORKER CENTER
26 NETWORK; UNITED FARM
27 WORKERS; COALITION FOR
28 HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF CATERIN
POSADA IN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com
JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
SARA H. WORTH (SBN 341088)
sara.worth@mto.com
HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com
MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

Counsel for Stop/Arrest Plaintiffs

JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

1 I, Caterin Posada, declare:

2 1. I make this declaration from my personal knowledge and, if called to testify to
3 these facts, could and would do so competently.

4 2. I am employed as an organizer at the Koreatown Immigrant Workers Alliance
5 ("KIWA"), a member organization of the Plaintiff Los Angeles Worker Center Network.
6 Founded in 1992, KIWA builds power with immigrant workers and renters to bring about a more
7 just and inclusive California. One of the nation's most established worker centers, KIWA
8 organizes primarily Latino and Korean workers, with a focus on the restaurant and retail
9 industries, in the Koreatown neighborhood of Los Angeles and beyond. Because of their immense
10 impact on workers' lives, KIWA works on, among other areas of importance to our members,
11 economic policy and immigration reform.

12 3. In my role as a KIWA organizer, I meet with, assist, and serve KIWA members. I
13 learn about the issues and challenges they face in their daily lives, how KIWA can better serve
14 them and their communities, and how to connect them with resources and support to live
15 dignified and fulfilling lives.

16 4. Through this work, I have come to know a KIWA member whom I refer to here as
17 "Norma," a pseudonym. Norma is a Latina member of KIWA who lives in Los Angeles County
18 and has work authorization. She works at a supermarket in Los Angeles in a predominantly
19 Latine neighborhood. On July 1, Norma was working at the supermarket when she and other
20 coworkers learned from two community members that individuals wearing green vests marked
21 "Border Patrol" and who appeared to be federal immigration agents were inside a parked,
22 unmarked van in front of the supermarket. This street is in an area known to house many
23 businesses owned by Latine members of the community, and also is a site where many Latine
24 street vendors work.

25 5. Norma was aware of the tactics of immigration authorities throughout Los Angeles
26 and their targeting of Latine individuals for stops just because of their appearance, employment
27 status, where they live and work, and the language they speak. Fearful that she would be stopped
28 and detained because she is Latina herself, Norma suffered a panic attack while at work and felt

1 she could not leave while agents were positioned outside the entrance of her place of
2 employment. Her supervisor, aware of immigration agents' tactics and profiling of Latine
3 workers and customers, shut down the store for approximately one hour during the time the van
4 remained outside. The agents eventually left.

5 6. This incident deeply traumatized Norma. As a result, Norma left her job and has
6 not returned for fear that immigration agents would come back. Because she knows they have
7 been active in the area since the raids began in June, she fears that they will return to her job site,
8 profile her, and stop her based on her Latina appearance, her work uniform, and her status as a
9 low-wage supermarket worker. She has taken on work cleaning homes for clients she knew
10 before the supermarket job, but only because she is driven to these locations without needing to
11 stop at public bus stops and take public transit—sites she fears immigration agents will target.
12 Despite this new work, she remains fearful that she can be stopped anywhere, particularly near
13 where she lives, itself an area where many working class Latine people live and work.

14 * * *

15 I declare under penalty of perjury that the foregoing is true and correct.

16
17 Executed on August 7, 2025

18  (Aug 7, 2025 10:41:21 PDT)

19 Caterin Posada

Declaration of Caterin Posada ISO MCC

Final Audit Report

2025-08-07

Created:	2025-08-07
By:	Mohammad Tajsar (MTajsar@adlusocal.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAleKbEbnITATDf0Xb9dR1MNSEkbvX2hOg

"Declaration of Caterin Posada ISO MCC" History







-  Document created by Mohammad Tajsar (MTajsar@adlusocal.org)
2025-08-07 - 3:28:17 PM GMT- IP address: 107.212.214.201
-  Document emailed to caterin@kiwa.org for signature
2025-08-07 - 3:28:52 PM GMT
-  Email viewed by caterin@kiwa.org
2025-08-07 - 3:29:00 PM GMT- IP address: 66.249.80.37
-  Signer caterin@kiwa.org entered name at signing as Caterin Posada
2025-08-07 - 5:41:19 PM GMT- IP address: 185.153.177.249
-  Document e-signed by Caterin Posada (caterin@kiwa.org)
Signature Date: 2025-08-07 - 5:41:21 PM GMT - Time Source: server- IP address: 185.153.177.249
-  Agreement completed.
2025-08-07 - 5:41:21 PM GMT

EXHIBIT 13

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRÁN (SBN 302081)
12 *ebitran@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SÁNCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 (Additional counsel listed on next page)

28 **UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos
Alexander OSORTO; and Isaac VILLEGAS
MOLINA; Jorge HERNANDEZ
VIRAMONTES; Jason Brian GAVIDIA;
LOS ANGELES WORKER CENTER
NETWORK; UNITED FARM WORKERS;
COALITION FOR HUMANE
IMMIGRANT RIGHTS; IMMIGRANT
DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as
Secretary, Department of Homeland
Security; Todd M. LYONS, in his official
capacity as

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF ELIZABETH
STRATER IN SUPPORT OF CLASS
CERTIFICATION**

Hon. Maame Ewusi-Mensah Frimpong

1 Acting Director, U.S. Immigration and
2 Customs Enforcement; Rodney S. SCOTT,
3 in his official capacity as Commissioner,
4 U.S. Customs and Border Patrol; Michael W.
5 BANKS, in his official capacity as Chief of
6 U.S. Border Patrol; Kash PATEL, in his
7 official capacity as Director, Federal Bureau
8 of Investigation; Pam BONDI, in her official
9 capacity as U.S. Attorney General; Ernesto
10 SANTACRUZ JR., in his official capacity as
11 Acting Field Office Director for Los
12 Angeles, U.S. Immigration and Customs
13 Enforcement; Eddy WANG, Special Agent
14 in Charge for Los Angeles, Homeland
Security Investigations, U.S. Immigration
and Customs Enforcement; Gregory K.
BOVINO, in his official capacity as Chief
Patrol Agent for El Centro Sector of the U.S.
Border Patrol; Jeffrey D. STALNAKER, in
his official capacity as Acting Chief Patrol
Agent, San Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official capacity
as Assistant Director in Charge, Los Angeles
Office, Federal Bureau of Investigation; Bilal
A. ESSAYLI, in his official capacity as U.S.
Attorney for the Central District of
California,

15 Defendants.

1 JACOB S. KREILKAMP (SBN 248210)
jacob.kreilkamp@mto.com
2 JAMIE LUMA (SBN 331610)
jamie.luma@mto.com
3 SARA H. WORTH (SBN 341088)
sara.worth@mto.com
4 HENRY D. SHREFFLER (SBN 343388)
henry.shreffler@mto.com
5 MAGGIE BUSHELL (SBN 354048)
maggie.bushell@mto.com
6 KYLE A. GROVES (SBN 358085)
kyle.groves@mto.com
7 MUNGER, TOLLES & OLSON LLP
350 S. Grand Ave., 50th Floor
8 Los Angeles, CA 90071
Tel: 213-683-9100; Fax: 213-683-9100

9 *Counsel for Stop/Arrest Plaintiffs*
10

11 JESSICA K. BANSAL (SBN 277347)
jessica@ndlon.org
12 LAUREN MICHEL WILFONG*
lwilfong@ndlon.org
13 NATIONAL DAY LABORER
ORGANIZING NETWORK
14 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
15 Tel: 626-214-5689

16 *Counsel for Stop/Arrest Plaintiffs*

17 BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
18 AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN
19 CALIFORNIA
39 Drumm Street
20 San Francisco, CA 94111
Tel: 415-621-2493

21 *Counsel for Stop/Arrest Plaintiffs*
22

23 BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
24 ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL COUNTIES
25 P.O. Box 87131
San Diego, CA 92138-7131
26 Tel: 619-398-4199

27 *Counsel for Stop/Arrest Plaintiffs*
28

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilasocho@farmworkerlaw.com
MARTÍNEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE IMMIGRANT
RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

1 I, Elizabeth Strater, declare:

2 1. I serve as Director of Strategic Campaigns and National Vice President of the
3 United Farm Workers of America ("UFW"). I have worked for UFW since 2017 and have been
4 National Vice President since I was elected by a Convention of farm worker union members in
5 September 2024. As a member of the elected Union Executive Board, I help direct the union's
6 work in organizing, negotiating, public campaigns, rulemaking, legislative campaigns and wide-
7 reaching advocacy on behalf of farm workers.

8 2. As Director of Strategic Campaigns, I direct campaigns on behalf of farm workers
9 to empower them to improve their safety, wages, working conditions and to underscore their basic
10 human dignity. An important part of my role is to humanize the essential contributions of farm
11 workers and to protect the rights of UFW's membership, the majority of whom are immigrants. I
12 have detailed knowledge about UFW's membership demographics, membership criteria, member
13 needs and priorities, and how members direct UFW's mission and advocacy. As part of my role as
14 Director of Strategic Campaigns and National Vice President, I regularly hear from UFW
15 members about their safety, wages, working conditions, immigration issues, and other concerns
16 members face in their communities. I also hear these concerns communicated through UFW
17 organizers who speak directly with members and report to the Board. In recent weeks, I have
18 heard from numerous members about the impact of the immigration raids in Southern California.

19 3. I make this statement based upon personal knowledge, files, and documents of
20 UFW that I have reviewed, as well as information supplied to me by employees of UFW whom I
21 believe to be reliable. These files, documents, and information are of a type that is generated in the
22 ordinary course of our business and that I would customarily rely upon in conducting UFW's
23 business. If called as a witness, I could testify truthfully to these facts.

24 **Background on UFW**

25 4. UFW is the largest farm worker union in the country. It represents thousands of
26 migrant and seasonal farm workers in various agricultural occupations throughout the United
27 States. It is headquartered in Kern County in Keene, California.

28 5. As of June 2025, UFW has approximately 10,000 members.

1 6. UFW members reside throughout the country. California is home to more UFW
2 members than any other state. In California, UFW members reside across the entire state,
3 including in counties across the Central District of California, such as Los Angeles County,
4 Orange County, Riverside County, Ventura County, and San Bernardino County. While many
5 UFW members live and work in the same County, other UFW members travel outside their home
6 County for work.

7 7. UFW membership is voluntary and consists of various categories of members.
8 Among these, contributing or associate members are individuals who make a monthly or annual
9 contribution of a designated amount to UFW. Dues-paying members are those who benefit from a
10 UFW collective bargaining agreement. In addition to these categories, UFW recognizes other
11 forms of membership, including full-time employees who have been employed for at least two
12 years, individuals recognized as martyred members due to their sacrifice in the struggle for social
13 justice, honorary members who are family members of martyred members, and retired members
14 who contribute voluntarily after leaving active employment.

15 8. Generally, individuals seeking to become contributing or associate members of
16 UFW complete an official application, which is reviewed and processed by UFW staff for
17 approval. Dues-paying members become members through the procedures set forth in the
18 California Agricultural Labor Relations Act or other applicable laws, their collective bargaining
19 agreements, and union rules.

20 9. UFW members play an important role in deciding what activities UFW engages in
21 as an organization. At the UFW's quadrennial Constitutional Convention, members introduce and
22 vote on motions to govern and guide the union's work, and to elect the Union Executive Board.
23 On an ongoing basis, UFW members respond to surveys, provide feedback, and participate in
24 advisory meetings (known as "consejo de base" in Spanish) to actively participate in the Union's
25 decisions. UFW has created various programs in response to members' feedback and requests. For
26 example, in 2008, in response to requests from our members, we created educational scholarships
27 for students who are working toward an undergraduate degree and are either eligible UFW
28 members or their dependents in California, Oregon, and Washington state.

1 10. UFW membership comes with a variety of benefits. Dues-paying members receive
2 protections from collective bargaining in which UFW engages on their behalf. Through an
3 established negotiating committee comprised of workers, UFW members negotiate benefits such
4 as medical insurance, pension, wages, paid time off, working conditions, seniority, right to recall,
5 equipment provisions and other terms of employment. Contributing or associate members (also
6 called “direct” members) receive accidental life insurance of \$4000, access to UFW discounts with
7 private businesses, and other benefits. In addition, for services that prioritize agricultural workers,
8 UFW direct membership establishes eligibility.

9 11. Founded in 1962 by Cesar Chavez, Dolores Huerta, Larry Itliong and other leaders,
10 UFW was created from the merger of workers’ rights organizations to form one union. Our
11 mission is to improve the lives, wages, and working conditions of agricultural workers and their
12 families.

13 12. To fulfill our mission, UFW engages in collective bargaining, worker education,
14 advocacy, state and federal legislation, and public campaigns. Our stated values are integrity, “Sí
15 se puede” attitude, dignity, and innovation. We promote total nonviolence as a core tenet. As a
16 result of UFW’s work, thousands of agricultural workers are protected under UFW contracts.
17 UFW has also sponsored and advocated for legal reforms to protect all farm workers at the state
18 and federal level, including related to overtime pay, heat safety, pesticides safety, COVID-19
19 protections, and other policies to protect farmworkers and advance their rights.

20 13. As part of this work, UFW is a national leader in the movement for immigration
21 reform and immigrants’ rights. For example, in 2022, UFW’s President Teresa Romero
22 participated in the House Education and Labor Subcommittee on Workforce Protections hearing
23 titled “Second Class Workers: Assessing H2 Visa Program Impact on Workers.” The H2-A visa
24 applies to seasonal farm workers. At this hearing, President Romero advocated for legislation that
25 would provide such farm workers with a path to citizenship and called on the federal government
26 and Congress to establish heat standards to protect farm workers from preventable heat deaths. We
27 have also spearheaded national public campaigns and congressional lobbying efforts to raise
28

1 public awareness of the critical role migrant farm workers play in our communities and economy
2 and advocate for immigration reform, including a path to citizenship for farm workers.

3 14. UFW members reach out to us to seek assistance, advocacy, advice, and
4 information, including on issues related to immigration and immigrants' rights. My team is in
5 constant contact with its membership through in-person meetings, emails, phone calls, text
6 messages, and social media, among other platforms. Members guide the organization at
7 Conventions and quarterly consejo de base (advisory) meetings and will reach out to union staff,
8 including me and my direct reports, on a daily basis via text message, phone, social media, email
9 or at a UFW office.

10 15. In addition to agricultural work, UFW members also work in other industries,
11 including food processing, landscaping, construction, and food vending. Because agricultural
12 work is seasonal, UFW members sometimes work in other industries when they are not doing
13 agricultural work. UFW members remain members even when they are not working at an
14 agricultural site.

15 **UFW Members Were Harmed by the Immigration Raids in Southern California and Fear**
16 **Harm from Future Immigration Operations**

17 16. Based on my reports from staff and members, I understand that UFW members and
18 their loved ones have been and continue to be directly harmed by the ongoing immigration raids in
19 Southern California. Immigration agents have targeted certain populations for federal immigration
20 enforcement, including farm workers and construction workers who are commuting to and from
21 work on highways and roads near agricultural operations. As described below, at least one UFW
22 member has been stopped by immigration agents during his commute to work. This UFW member
23 and at least two more members have been harmed by the overmilitarization that has characterized
24 the Southern California raids, as they each live in ongoing fear that they will be stopped by
25 masked immigration agents who patrol the areas where they live, work, and commute.

26 17. Based on my reports from members and their families, I understand that the
27 operations have caused widespread panic among UFW members across Southern California. On
28 the days when raids have occurred, some staff directly witnessed the raids while others received

1 reports from UFW contacts and members. In the early hours of Friday June 13, 2025, there were
2 reports of immigration enforcement operations that targeted a bakery and a mall in Moorpark,
3 California (located in Ventura county). Videos from that day show agents taking someone from
4 the bakery. Many UFW members work in the Moorpark area and the bakery that was targeted is a
5 frequent meeting place for UFW members. Some UFW members were already at work and heard
6 about these immigration enforcement actions through social media, news reports, and word-of-
7 mouth. Fearing they would be targeted based on their race or apparent occupation, many UFW
8 members went home, afraid to remain on work sites and seeking to avoid accessing roads and
9 highways, where there were reports of masked immigration agents indiscriminately stopping or
10 pulling over farm workers and day laborers, arresting and detaining them, and seeking to expel
11 them from the country.

12 18. UFW staff who have been in Moorpark have reported that the immigration arrests
13 there have frightened UFW members and the community. The manner in which these raids are
14 being conducted—including by individuals hiding behind masks, who fail to identify themselves,
15 and wearing military gear—has UFW members and staff fearing for their safety. This fear has
16 only been aggravated by recent news reports that private individuals are stopping and detaining
17 people they assume to be noncitizens. Because workers are already vulnerable to human
18 trafficking, these reports only exacerbate the fear and anxiety that UFW members and the
19 community are experiencing.

20 19. I also understand that the panic and fear described above were, and are, felt by
21 UFW members of diverse immigration statuses. Based on UFW's institutional and direct
22 understanding with such raids, ICE's and Border Patrol's practices target non-white and/or
23 Spanish-speaking farm workers and day laborers broadly, without regard to whether particular
24 farm workers or day laborers have lawful presence or deep ties to the local community. For
25 instance, UFW members who are U.S. citizens and lawful permanent residents nevertheless feel
26 anxious about being swept up in future raids because of reports that ICE's and Border Patrol's
27 operations indiscriminately stop and arrest people regardless of status. UFW members with
28 employment authorization documents, such as those with H-2A temporary agricultural visas, T-

1 visas, Temporary Protected Status, Deferred Action for Labor Enforcement, or Deferred Action
2 for Childhood Arrivals, similarly express fear to me and my team that immigration agents will
3 seize, arrest, and/or detain them for removal without regard to their authorization to be in the U.S.

4 20. In response to the Southern California raids and the harms they inflicted on UFW
5 members, we mobilized quickly to support our members. We connected members with
6 immigration attorneys, helped them identify where their loved ones were being detained, assisted
7 affected families in locating emergency supplies needed for survival, and did additional outreach
8 to identify people who had been detained.

9 21. UFW members have continued to live in fear of immigration actions since the raids
10 began. Although UFW members read news reports of the Trump Administration's short-lived
11 stated pause on raids at farms and restaurants, that so-called pause was reversed. I understand that
12 people remained fearful that they would be subjected to a raid because they have seen immigration
13 enforcement operations at agricultural sites in Southern California during the pause and as recent
14 as July 10. As immigration raids at farms and hotels occur, UFW members continue to fear that
15 they will be stopped or arrested when they are at work or on a highway on their way to or from
16 work.

17 22. I also understand based on my reports from members and their families that the fear
18 of future immigration enforcement operations similar to the Southern California raids has deeply
19 affected UFW members and has prompted many of them to change how they arrange their lives.
20 For example, many UFW members, including those who live and work in Moorpark and other
21 parts of Ventura and Los Angeles Counties, are no longer running errands or making trips to
22 places such as laundromats out of fear of continuing immigration enforcement and because these
23 sites have been targeted by immigration agents for stops, arrests, and detentions. My staff have
24 described places like Moorpark, which has been targeted by the immigration raids, as a "ghost
25 town."

26 23. UFW members, including those who live and work in Ventura and Los Angeles
27 Counties, who have young children are terrified of being swept up in a raid and separated from
28 their children, who may have no one to take care of them. Many members have kept their children

1 home from school or daycare and avoided going to doctor's appointments, church, or the store,
2 paralyzed by the fear of being arrested with no notice. Members with young children have
3 arranged for a trusted community member to pick their children up from school or daycare to
4 minimize the risk of being detained, arrested, or taken away by Border Patrol in front of their
5 children. Members who are parents of school aged children are reluctant to attend school meetings
6 in case of an indiscriminate raid, hindering them from being an active participant in their child's
7 education. These members leave for work each day scared they will not come home to their
8 children because of another enforcement action by immigration authorities.

9 24. Since the chaotic raid in Camarillo on July 10, 2025, UFW members have been
10 experiencing even heightened anxiety when leaving their homes—whether to go to work or to run
11 normal family errands. This fear extends even to those workers with legal status, as they have
12 witnessed immigration enforcement agents arrest and detain individuals—including U.S. citizens
13 or others with lawful status—without clear justification.

14 25. Workers who were present at the deadly Camarillo raid continue to experience
15 trauma and psychological distress from witnessing the violent detention and arrests of their
16 coworkers. UFW staff has met with over 100 workers who are too fearful to return to work at
17 Glass House alone. This fear is not isolated—it has spread to many other workplaces in Ventura
18 County. Our general meetings that are hybrid (both in person and virtual), which were previously
19 attended roughly 70% in person and 30% virtually, have now flipped: with 30% of members
20 attending in person and 70% virtual. This shift makes it more difficult to provide our members
21 with the support they need, for issues like workers compensation, wage and hour concerns and
22 other workplace issues. Often an organizer needs to follow up individually instead of being able to
23 assist many workers at a single meeting.

24 26. As a result of the ongoing Southern California raids, and statements by the Trump
25 Administration encouraging that immigration authorities continue targeting places with
26 Democratic-run cities and meeting immigration arrest quotas, many UFW members, regardless of
27 the stability or permanence of their immigration status, fear that farm workers and day laborers
28 will continue to be subjected to immigration stops and arrests, especially those who appear non-

1 white. Some farm workers who are afraid that they will be stopped because of their occupation
2 have been washing their cars daily to remove any dirt that could suggest to an immigration agent
3 that they work in agricultural fields. They are terrified that immigration agents will continue to
4 arrest people without warrants and without regard to how long someone has been living in the
5 community or the family members they have waiting for them, including young children; and that
6 immigration agents will continue to detain people, regardless of immigration status, in a detention
7 facility without the ability to contact their family members or an attorney.

8 27. I also understand, based on my reports from members and their families, that the
9 tactics employed during the Southern California raids quickly circulated among the UFW
10 community. These reports and videos left many UFW members feeling deeply fearful, regardless
11 of the stability or permanence of their immigration status. Our members have expressed their
12 alarm that immigration agents conducting any future operation will run roughshod over their
13 constitutional rights if they attempt to assert them during a stop, seizure, arrest, and/or detention.

14 28. Because of the Southern California raids and the deep harms they are inflicting on
15 farm worker families and communities, UFW members feel chilled from exercising their right to
16 speak up about workplace abuses or wage theft. They are scared that speaking up will attract
17 negative attention to themselves, and that a vengeful employer could call immigration
18 enforcement to report them. They are also scared to speak in public settings about their
19 experiences for fear of backlash, retaliation, or abuse by immigration authorities or private
20 individuals. They feel the risks of being separated from their families and expelled from their
21 homes are too great.

22 **Stories of UFW Members Harmed By the Southern California Raids and Who Fear Harm**
23 **From Future Operations**

24 Angel¹

25 29. Through my role as National Vice President in the ordinary course of UFW's
26 business, I also received a report of how the Southern California raids impacted UFW member
27

28 ¹ To protect the privacy and security of our members, I am using fictitious names to identify them.

1 “Angel.” Angel is a U.S. citizen who identifies as Latino and is a resident of Ventura County. His
2 primary language is Spanish. He speaks English with an accent. Angel walks to work in Ventura
3 County. He lives, shops, and works in a community where farm workers and day laborers live,
4 work, and gather. He was seeking day labor work for the day.

5 30. Immigration agents stopped Angel in Ventura County when he was walking to a
6 community center with a coworker. Angel and his coworker were approached by two vehicles, a
7 U.S. Customs and Border Patrol truck and a plain, white car filled with what appeared to be
8 soldiers wearing military clothing, that pulled up to them suddenly. The Border Patrol agent
9 driving the truck asked Angel where he was born. Angel responded that he was born in Simi
10 Valley. The Border Patrol agent then asked what hospital, and Angel provided the hospital’s
11 name. The agent then turned to Angel’s coworker, asking “what about you?” When Angel’s
12 coworker, Roberto, responded in Spanish, the agents exited the vehicle, grabbed Roberto, took
13 him to the truck, and loaded him inside. Angel started walking away but the agents demanded he
14 return. Angel told them again that he was a U.S. citizen. The agents told him to show them his
15 identification. The agents did not permit Angel to leave until after he showed them his California
16 ID.

17 31. The immigration stop frightened Angel. He feared he was going to be taken despite
18 his status as a U.S. citizen. Since that day, Angel is always looking over his shoulder whenever he
19 leaves home. Angel fears that immigration agents will again profile and stop him again for his
20 apparent race and/or profession.

21 Carla

22 32. Through my role as National Vice President in the ordinary course of UFW’s
23 business, I received reports of UFW members impacted by the Southern California raids,
24 including UFW member “Carla”.

25 33. Carla is a Lawful Permanent Resident who lives in Ventura County. She has been a
26 UFW member for more than 20 years. For decades, she has worked at a farm in Moorpark
27 harvesting radishes and cilantro. She identifies as Latina and speaks Spanish as her primary
28

1 language. She speaks English with an accent. She lives and works in a community that is
2 predominantly farm workers.

3 34. Carla is aware of the immigration enforcement actions across agricultural
4 operations in Southern California. She is also aware of the credible reports that immigration agents
5 have stopped and detained people who appear Latino and who appear to be farm workers
6 regardless of their actual immigration status. Carla fears that immigration agents will go into the
7 fields where she works to detain all workers, and that she will be detained, regardless of her lawful
8 status. Carla has seen immigration agents are targeting people for their clothing and stopping
9 people who are wearing the agriculture worker uniform: hats and long sleeve t-shirts. As a result
10 of immigration agents' conduct targeting Latino people and farm workers, Carla has missed work
11 and is consequently losing wages, vacation accruals, and other benefits. For example, since the
12 raids began in Southern California, Carla has missed several days of work. She lost about half of
13 her weekly salary and contributed less to her pension plan and medical plan, both because she was
14 afraid she would be wrongfully targeted for immigration enforcement, and because her worksite's
15 harvest was cancelled for multiple days due to federal immigration agents' activity. Carla is going
16 to struggle to make ends meet in July because she will have lost so much in wages. Carla remains
17 afraid to go to work based on credible reports of continued raids on agricultural workers. Carla has
18 tried to limit her trips outside of the home to necessities, such as going to buy food or going to a
19 laundromat, but the raids leave Carla with an impossible choice. She has children who depend on
20 her. As a caregiver for her children, she cannot avoid going out into the community to places
21 immigration agents appear to be targeting.

22 Belinda

23 35. Through my role as National Vice President in the ordinary course of UFW's
24 business, I also received a report of how the Southern California raids impacted UFW member
25 "Belinda".

26 36. Belinda is a long-time resident of Ventura County. She identifies as Latina and
27 lives in Ventura County. Belinda is a Spanish speaker. She speaks limited English with an accent.
28 She drives to work in Ventura County. She has been an agricultural worker for nearly a decade.

1 Belinda has many ties to the community, having worked in the fields with her husband for years.
2 Together, they have four sons and daughters, all of whom are either U.S. Citizens or have
3 documented immigration status in the U.S.

4 37. On Friday, June 13, 2025, Belinda's husband, "Andy", a Latino, senior citizen who
5 is a day laborer left their home in Ventura County early in the morning to commute to work. As he
6 walked to work, men with no identifying attire approached him aggressively and grabbed him
7 forcefully. They arrested him and have held him in immigration detention for over ten days.
8 Belinda has been suffering since Andy's arrest. She is worried that, like Andy, she will be stopped
9 by immigration agents and placed in detention proceedings. Belinda identifies as Latina and fears
10 that she too will be stopped, arrested, and detained as her husband was, based only on her
11 appearance.

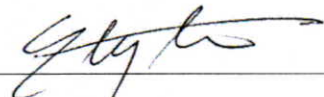
12 38. In her husband's absence, Belinda is the sole caregiver for her sons and daughters.
13 If she is stopped, arrested, and detained, as her husband was, she will be separated from her sons
14 and daughters. Belinda fears going to the grocery store and tries to avoid going to public places,
15 including the laundromat, but she cannot avoid commuting to work and taking care of her
16 families' needs, even though this puts her at risk of being stopped, arrested, and detained.

17 ***

18 39. UFW employees and I understand that this case may proceed as a class action. We
19 understand UFW's responsibilities and role as a representative for the Suspicionless Stop Class.
20 We understand the need to stay informed with what is happening in the case and that we need to
21 consider the interests of other class members (both UFW and non-UFW members) and act on
22 those interests. We are aware of no relevant conflicts of interest between UFW and members of
23 the Suspicionless Stop Class. We are prepared to represent the class and will take seriously the
24 organization's responsibilities in connection with that representation.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on August 7, 2025

27 

28 Elizabeth Strater

EXHIBIT 14

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

3 Pedro VASQUEZ PERDOMO, *et al.*

Case No.: 2:25-cv-05605-MEMF-SP

4 Plaintiffs,

**DECLARATION OF
ANGELICA SALAS**

5 v.

6 Kristi NOEM, in her official capacity as
7 Secretary, Department of Homeland
8 Security, *et al.*

Hon. Maame Ewusi-Mensah Frimpong

8 Defendants.

9
10
11 I, Angelica Salas, make the following statements on behalf of myself and the
12 Coalition for Humane Immigrant Rights (“CHIRLA”).

13 1. I incorporate by reference my previous declarations submitted to this Court
14 on July 2, 2025 and July 28, 2025. *See* [ECF 38-9](#) and [ECF 128-11](#).

15 2. CHIRLA’s pursuit of this litigation is pertinent to the organization’s mission
16 of advancing the human and civil rights of immigrants and refugees, and CHIRLA has no
17 relevant conflicts of interest with its members.

18 3. My colleagues and I understand that this is a class-action lawsuit. We
19 understand the organization’s responsibilities and role as a representative for the
20 Suspicionless Stop Class. We understand the need to stay informed with what is happening
21 in the case and that we need to think about the interests of other class members (both those
22 that are CHIRLA members and those who are not) and act on those interests. We are
23 prepared to represent the class and will take seriously the organization’s responsibilities in
24 connection with that representation.

25 4. The situation in Los Angeles for our CHIRLA members and the broader
26 immigrant community continues to be dire despite the Court’s temporary restraining order.
27 On August 6, 2025, a Home Depot on Wilshire Boulevard in Los Angeles, less than one
28 mile from our headquarters, was descended upon by federal agents, resulting in multiple

1 arrests that appear at odds with this Court's Temporary Restraining Order.¹ I do not doubt
2 that this particular action at this time and in this location was meant to spread fear. The Los
3 Angeles Raids Rapid Response Network ("LARRN") responded as it almost always does,
4 documenting the aftermath and collecting evidence.

5 5. Our members and their families continue to remain fearful of the possibility
6 of being subject to unlawful stops by federal agents based on racial profiling and they are
7 chilled in what used to be normal daily activities.

8 6. CHIRLA member M.G. has been a member since 2020. He is undocumented
9 and deeply fearful of being detained by immigration authorities. As a dark-skinned man
10 with facial features that mark him as visibly Latino, he fears being subjected to a
11 suspicionless stop by immigration officials on the basis of his race. Moreover, as a
12 monolingual Spanish speaker who speaks only Spanish when he goes out in public, he fears
13 that if an immigration official were to hear him speaking, they would detain him on those
14 grounds. As a construction worker who works at a variety of construction sites, he also
15 fears he could be detained in an immigration raid that targets construction workers on the
16 jobsite.

17 7. After the raids began, M.G. started going to work in clothes that he would
18 normally wear to church or to a social gathering, so that any immigration officials he might
19 pass on the way to work would not see him dressed in his work attire, clothing that makes
20 it clear that he works in construction. Once he arrives at work, he changes into his work
21 attire, and before leaving work for the day, changes back into the more formal clothes that
22 he wears while driving. However, during the workday, he is dressed in his work attire,
23 which becomes soiled with dirt and dust, clearly marking him as a manual laborer. He
24 fears encountering immigration officials while dressed this way, as he believes this could
25 spur them to illegally stop and interrogate him. Additionally, when he drives to work, he

26
27 ¹ Sam Levin, *Border patrol agents jump out of rental truck and ambush people at LA*
28 *Home Depot*, The Guardian (August 6, 2025), <https://www.theguardian.com/us-news/2025/aug/06/ice-border-patrol-home-depot-los-angeles>

1 must bring his own tools, which are visible in the car as he is driving. He likewise fears
2 that this will cause immigration officials to illegally stop and investigate him.

3 8. Under normal circumstances, M.G. would frequent stores with large Latino
4 clienteles, such as Latino grocery stores. He fears that simply being present in such places
5 could cause him to be targeted by immigration agents. M.G. has also cut back his work
6 schedule. And he no longer leaves the house for non-work purposes, except to drive
7 straight to church, then straight home. Likewise, his family has stopped going on trips to
8 the beach, which they used to do somewhat regularly, and he relies on his adult children to
9 bring groceries for his wife and him.

10 9. Another longstanding CHIRLA member, A.L., almost no longer leaves her
11 house and when she does, she does so with great fear after working up enough courage.
12 She is visibly Latino and a monolingual Spanish speaker, who fears not being able to
13 answer any questions posed to her in English by immigration agents and being detained on
14 that basis. The husband of A.L., Q.M., is also a CHIRLA member and he has stopped
15 working since the raids began. His truck is clearly that of a construction worker and he is
16 worries about going to his worksites where the majority of his colleagues are Latino,
17 making them targets. Having heard about the raids at Home Depots, he recounts how his
18 work would require him to go there for materials and that this is another reason he has
19 stopped working. Q.M. suffers from a health condition requiring to use special equipment
20 to help him sleep, but so far he has missed two doctor's appointments. The thought of a
21 family medical emergency that would necessitate leaving the house is a cause of great
22 concern to him.

23 10. V.M. has been an active CHIRLA member since 2015 and makes her living
24 selling drinks, frozen fruit bars and packaged snacks. As a Spanish-only speaking Latina
25 with darker skin, whose work requires her to stand in public, she feels she is a likely target
26 for immigration officials. This fear is further exacerbated by the fact that she does not have
27 a car, so V.M. uses walking as her main method of transportation. As she cannot stop
28 working altogether for financial reasons, she has cut down work to the bare minimum for

1 subsistence, working only on weekends. And she has given up her preferred vending
2 location in front of a school to further minimize the risk. V.M. is both anxious and
3 depressed, and she fears not just being stopped but illegally arrested and deported.

4 11. These examples are but a few, and they are not exclusive to our members and
5 clients. In my many years with CHIRLA, I reiterate my previous statements that I have
6 never witnessed anything like what has been taking place throughout our communities.

7
8 I declare under penalty of perjury under the laws of the United States that the
9 foregoing is true and correct.

10
11 Los Angeles, CA

12 Dated: August 7, 2025

13 By:



14 Angelica Salas
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 15

1 STACY TOLCHIN (SBN 217431)
2 *stacy@tolchinimmigration.com*
3 LAW OFFICES OF STACY TOLCHIN
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Tel: 213-622-7450; Fax: 213-622-7233

7 MOHAMMAD TAJ SAR (SBN 280152)
8 *mtajsar@aclusocal.org*
9 MAYRA JOACHIN (SBN 306065)
10 *mjoachin@aclusocal.org*
11 EVA BITRAN (SBN 302081)
12 *ebitrان@aclusocal.org*
13 DAE KEUN KWON (SBN 313155)
14 *akwon@aclusocal.org*
15 OLIVER MA (SBN 354266)
16 *oma@aclusocal.org*

17 STEPHANIE PADILLA (SBN 321568)
18 *spadilla@aclusocal.org*
19 DIANA SANCHEZ (SBN 338871)
20 *dianasanchez@aclusocal.org*
21 ACLU FOUNDATION OF
22 SOUTHERN CALIFORNIA
23 1313 West Eighth Street
24 Los Angeles, CA 90017-4022
25 Tel: 213-977-5232; Fax: 213-201-7878

26 *Counsel for Stop/Arrest Plaintiffs*

27 *(Additional counsel listed on next page)*

MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
REBECCA BROWN (SBN 345805)
rbrown@publiccounsel.org
SOPHIA WRENCH (SBN 354416)
swrench@publiccounsel.org
RITU MAHAJAN (SBN 252970)
rmahajan@publiccounsel.org
GINA AMATO (SBN 215519)
gamato@publiccounsel.org
PUBLIC COUNSEL
610 South Ardmore Avenue
Los Angeles, CA 90005
Tel: 213-385-2977

Counsel for All Plaintiffs

ANNE LAI (SBN 295394)
alai@law.uci.edu
UC IRVINE SCHOOL OF LAW
IMMIGRANT AND RACIAL JUSTICE
SOLIDARITY CLINIC
P.O. Box 5479
Irvine, CA 92616-5479
Tel: 949-824-9894; Fax: 949-824-2747

Counsel for Stop/Arrest Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

Pedro VASQUEZ PERDOMO; Carlos
Alexander OSORTO; and Isaac
VILLEGAS MOLINA; Jorge
HERNANDEZ VIRAMONTES;
Jason Brian GAVIDIA; LOS
ANGELES WORKER CENTER
NETWORK; UNITED FARM
WORKERS; COALITION FOR
HUMANE IMMIGRANT RIGHTS;
IMMIGRANT DEFENDERS LAW
CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity
as Secretary, Department of Homeland

Case No.: 2:25-cv-05605-MEMF-SP

DECLARATION OF GRAEME BLAIR IN SUPPORT OF CLASS CERTIFICATION

Hon. Maame Ewusi-Mensah Frimpong

1 Security; Todd M. LYONS, in his
2 official capacity as
3 Acting Director, U.S. Immigration and
4 Customs Enforcement; Rodney S.
5 SCOTT, in his official capacity as
6 Commissioner, U.S. Customs and
7 Border Patrol; Michael W. BANKS, in
8 his official capacity as Chief of U.S.
9 Border Patrol; Kash PATEL, in his
10 official capacity as Director, Federal
11 Bureau of Investigation; Pam BONDI,
12 in her official capacity as U.S.
13 Attorney General; Ernesto
14 SANTACRUZ JR., in his official
15 capacity as Acting Field Office
16 Director for Los Angeles, U.S.
17 Immigration and Customs
18 Enforcement; Eddy WANG, Special
19 Agent in Charge for Los Angeles,
20 Homeland Security Investigations,
21 U.S. Immigration and Customs
22 Enforcement; Gregory K. BOVINO,
23 in his official capacity as Chief Patrol
24 Agent for El Centro Sector of the U.S.
25 Border Patrol; Jeffrey D.
26 STALNAKER, in his official capacity
27 as Acting Chief Patrol Agent, San
28 Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in
Charge, Los Angeles Office, Federal
Bureau of Investigation; Bilal A.
ESSAYLI, in his official capacity as
U.S. Attorney for the Central District
of California,

Defendants.

1 JACOB S. KREILKAMP (SBN
2 248210)
3 *jacob.kreilkamp@mto.com*
4 JAMIE LUMA (SBN 331610)
5 *jamie.luma@mto.com*
6 SARA H. WORTH (SBN 341088)
7 *sara.worth@mto.com*
8 HENRY D. SHREFFLER (SBN
9 343388)
10 *henry.shreffler@mto.com*
11 MAGGIE BUSHELL (SBN 354048)
12 *maggie.bushell@mto.com*
13 KYLE A. GROVES (SBN 358085)
14 *kyle.groves@mto.com*
15 MUNGER, TOLLES & OLSON LLP
16 350 S. Grand Ave., 50th Floor
17 Los Angeles, CA 90071
18 Tel: 213-683-9100; Fax: 213-683-9100

19 *Counsel for Stop/Arrest Plaintiffs*

20 JESSICA K. BANSAL (SBN 277347)
21 *jessica@ndlon.org*
22 LAUREN MICHEL WILFONG*
23 *lwilfong@ndlon.org*
24 NATIONAL DAY LABORER
25 ORGANIZING NETWORK
26 1030 S. Arroyo Parkway, Suite 106
27 Pasadena, CA 91105
28 Tel: 626-214-5689

Counsel for Stop/Arrest Plaintiffs

BREE BERNWANGER (SBN 331731)
bbernwanger@aclunc.org
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Tel: 415-621-2493

Counsel for Stop/Arrest Plaintiffs

BRISA VELAZQUEZ OATIS
(SBN 339132)
bvoatis@aclu-sdic.org
ACLU FOUNDATION OF
SAN DIEGO & IMPERIAL
COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
Tel: 619-398-4199

Counsel for Stop/Arrest Plaintiffs

MATTHEW J. CRAIG (SBN 350030)
mcraig@heckerfink.com
MACK E. JENKINS (SBN 242101)
mjenkins@heckerfink.com
HECKER FINK LLP
1150 South Olive Street, Suite 10-140
Los Angeles, CA 90015
Tel: 212-763-0883; Fax: 212-564-0883

Counsel for Access/Conditions Plaintiffs

EDGAR AGUILASOCHO
(SBN 285567)
eaguilascho@farmworkerlaw.com
MARTINEZ AGUILASOCHO LAW, INC.
900 Truxtun Ave, Suite 300
Bakersfield, CA 93301
Tel: 661-859-1174

Counsel for Plaintiff United Farm Workers

CARL BERGQUIST*
cbergquist@chirla.org
COALITION FOR HUMANE
IMMIGRANT RIGHTS
2351 Hempstead Road
Ottawa Hills, OH 43606
Tel: 310-279-6025

*Counsel for Plaintiff Coalition for Humane
Immigrant Rights*

ALVARO M. HUERTA (SBN 274787)
ahuerta@immdef.org
BRYNNA BOLT (SBN 339378)
bbolt@immdef.org
ALISON STEFFEL (SBN 346370)
asteffel@immdef.org
IMMIGRANT DEFENDERS LAW
CENTER
634 S. Spring St., 10th Floor
Los Angeles, CA 90014
Tel: 213-634-0999

*Counsel for Plaintiff Immigrant
Defenders Law Center*

* Admitted pro hac vice

1 I, Graeme Blair, declare:

2 1. I make this declaration from my personal knowledge and, if called to testify to
3 these facts, could and would do so competently.

4 2. I am an Associate Professor of Political Science at the University of California,
5 Los Angeles and Faculty Affiliate of the Department of Statistics and the California Center for
6 Population Research at the University of California–Los Angeles. I study how to reduce violence
7 and how to make social science more credible, ethical, and useful. I teach courses on research
8 design and data analysis for undergraduates and Ph.D. students. My book, *Research Design in the*
9 *Social Sciences*, was published by Princeton University Press in 2023, and my book *Crime,*
10 *Insecurity, and Community Policing* was published by Cambridge University Press in 2024. I
11 received a Ph.D. in politics from Princeton University and a B.A. in political science from Reed
12 College. I am a recipient of the Leamer-Rosenthal Prize in Open Social Science.

13 3. I am the Deputy Director of the Deportation Data Project. The project collects and
14 posts public, anonymized U.S. government immigration enforcement datasets. The group uses the
15 Freedom of Information Act to gather datasets directly from the government, and also posts
16 datasets that the government has posted proactively or in response to others' requests. The data
17 have been used by scholars and journalists to inform the public about changing immigration
18 enforcement policies not reflected in publicly-available agency documents, resulting in hundreds
19 of stories in the media in 2025.

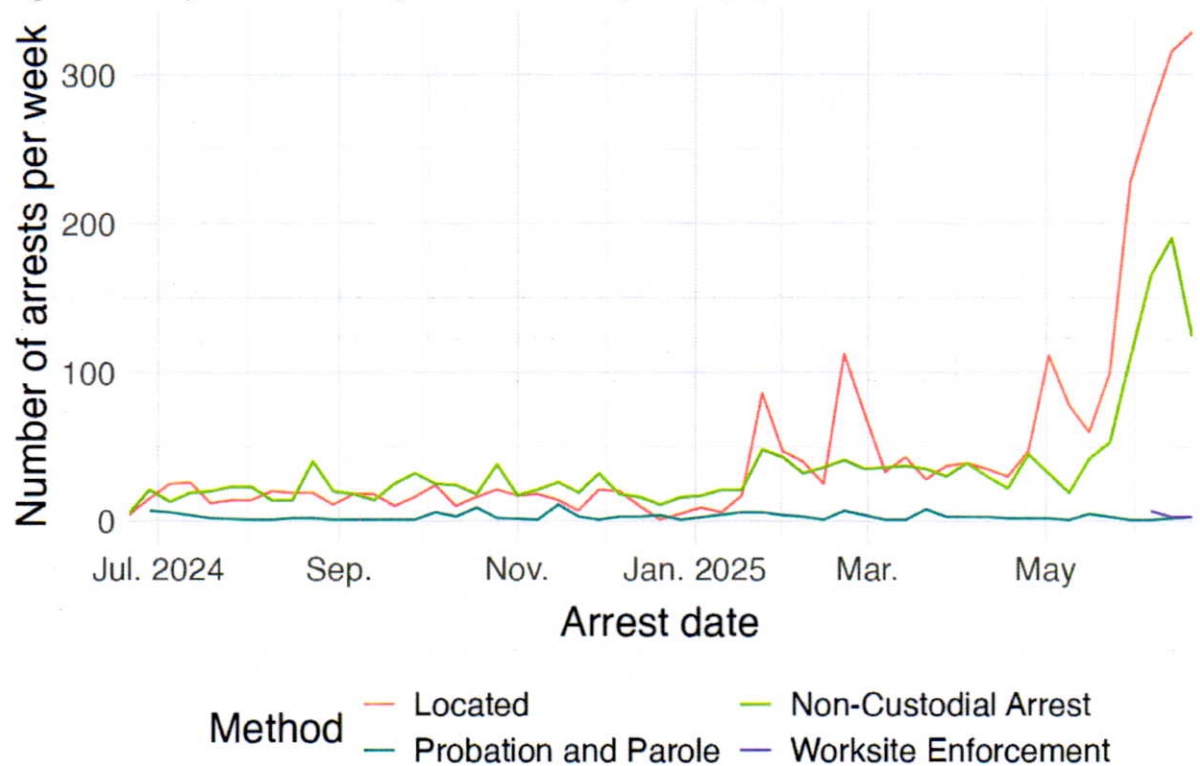
20 4. For the information I provide in this declaration, I draw on the late June 2025
21 release of data from Immigrations and Customs Enforcement (ICE), and in particular the table it
22 provided of administrative arrests. They represent the most up-to-date publicly-accessible data at
23 the individual level on ICE's arrest patterns. The data were produced in response to a FOIA
24 request filed by the Center for Immigration Law and Policy at UCLA Law School in May 2024
25 and a lawsuit filed by the Center, *Center for Immigration Law and Policy v. ICE*, in December
26 2024 after the data were not provided in a timely way. The data are available on the project web
27 site at deportationdata.org/data/ice.html.

28

5. At the request of Plaintiffs' counsel in this matter, I generated a summary of the weekly¹ rate of arrests by Immigration and Customs Enforcement (ICE) over time for the one year before the latest available date, June 26, 2025. The data describe approximately 170,000 arrests during that period.²

6. Below is a chart depicting the weekly count of arrests in the ICE Los Angeles Area of Responsibility³ in four categories, based on arrest method: those labeled "Located,"

Figure 1: Weekly arrests in Los Angeles ICE area of responsibility by arrest method



¹ Arrest rates vary systematically by day, e.g., are lower on weekends, and so aggregating by week facilitates comparison of trends over longer periods of time.

² There are a small number of records in which there are multiple arrests for the same individual's unique identifier within a 24-hour span (about 2,000 out of the approximately 170,000 records or about one percent). These records may in a very small number of cases reflect more than one arrest in a short period of time, but most are likely multiple records reflecting the same arrest. I collapsed each set of records for a given unique identifier within a 24-hour span into one, to count the number of arrests conservatively. I select the apprehension method of the first record for my analysis; which one of the possible ways I use to code the apprehension method for these cases does not significantly change the overall depiction of ICE arrests over time in the community.

³ ICE does not provide a finer-grained geographic categorization of arrests than the area of responsibility or the state, which in this case would be larger.

1 “Non-Custodial Arrest,” “Probation and Parole,” and “Worksite Enforcement.” According to
2 ICE, the Los Angeles Area of Responsibility includes seven counties in California: Los Angeles,
3 Orange, Riverside, Santa Barbara, San Bernardino, San Luis Obispo, and Ventura.⁴

4 7. I included the four categories of arrest method discussed in paragraph (6) to
5 approximate arrests that appear to be conducted in the community as opposed to in a custodial
6 setting. ICE defines “at large arrests,” as those “conducted in the community, as opposed to in a
7 custodial setting such as a prison or jail.”⁵ In its annual Enforcement and Removal Operations
8 Report for FY 2017, ICE states that it aggregated “at large arrests” from three categories in its
9 databases: “ERO administrative arrests reported as ‘at-large’ include records from all ERO
10 Programs with Arrest Methods of Located, Non-Custodial Arrest, or Probation and Parole.”⁶ To
11 this list I added “Worksite Enforcement.”

12 8. Out of the categories that are not included, the largest are: “287(g) Program,”
13 “CAP Federal Incarceration,” “CAP Local Incarceration,” “CAP State Incarceration,” “ERO
14 Reprocessed Arrest,” and “Other efforts.” There are much smaller sets of arrests, categorized as
15 “Anti-Smuggling” (66), “Boat Patrol” (10), “Crewman/Stowaway” (2), “Criminal Alien
16 Program” (4), “Inspections” (96), “Law Enforcement Agency Response Unit” (705), “Organized
17 Crime Drug Enforcement Task Force” (23), “Other Agency (turned over to INS)” (311), “Other
18 Task Force” (462), “Patrol Border” (74), “Patrol Interior” (50), “Traffic Check” (60),
19 “Transportation Check Aircraft” (11), “Transportation Check Bus” (5), and “Transportation
20 Check Passenger Train” (1). Given that in total there are approximately 170,000 arrests in this
21 time period, whether any of these are included in the counts or not does not significantly change
22 the overall depiction of ICE arrests over time in the community.

23
24 ⁴ <https://www.ice.gov/field-office/los-angeles-field-office>

25 ⁵ <https://www.ice.gov/remove/removal-statistics/2017>

26 ⁶ See <https://www.ice.gov/sites/default/files/documents/Report/2017/iceEndOfYearFY2017.pdf>.
27 When independent analysts compared ICE’s numbers to an analysis following this stated coding
28 scheme, the figures matched exactly. See https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/changing_patterns_of_interior_immigration_enforcement_in_the_united_states.pdf

1
2 I declare under penalty of perjury that the foregoing is true and correct.

3
4 Executed on August 6, 2025



5
6 Graeme Blair, Ph.D.