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Counsel for petitioner.

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

S.F.,)	3:25-cv-1084
)	
Petitioner,)	
)	Agency No.
vs.)	
)	AXXX-XXX-755
DREW BOSTOCK, Seattle Field Office)	
Director, U.S. Immigration and Customs)	DECLARATION IN
Enforcement and Removal Operation, KRISTI)	SUPPORT OF MOTION FOR
NOEM, Secretary of Homeland Security,)	TEMPORARY
PAMELA BONDI, Attorney General, TODD)	RESTRAINING ORDER
LYONS, Acting Director of Immigration and)	
Customs Enforcement, U.S. DEPARTMENT)	
OF HOMELAND SECURITY, U.S.)	
IMMIGRATION AND CUSTOMS)	
ENFORCEMENT, and U.S. DEPARTMENT)	
OF JUSTICE)	
)	
Respondents.)	

Under penalty of perjury, I, the undersigned, do solemnly declare:

1. My name is Michael T. Purcell. I am member of the Oregon State Bar and admitted to practice before this court.

2. On the morning of June 24, 2025, at about 8:00 a.m., I received a telephone call from the spouse of the petitioner in this case. She informed me, in substance, that the petitioner had left his house to drive to his gym. He was pulled by ICE (Immigration and Customs Enforcement) agents while driving, and arrested. She further informed me that she had learned that ICE was holding the petitioner in custody at their Portland location.

3. I know that the ICE Portland facility is located at 4310 S Macadam Ave. Portland, OR 97239.

4. The petitioner was scheduled to have an ICE check-in on July 7, 2025. I have seen news reports that ICE is arresting people in vehicle stops rather than at court or, apparently at ICE check-ins.

5. I have conducted an appropriate inquiry into the circumstances of this case, and I believe that all factual allegations contained in the petition for habeas corpus are true.

6. Based on news reports and contact with other immigration lawyers, I believe that respondents intend either to remove petitioner from the District of Oregon, either to the respondents' detention center in Tacoma, Washington, or further, possibly to a detention

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facility in Louisiana. In either case, it will be made much more difficult for petitioner to contest the lawfulness of his detention by way of a petition for habeas corpus.

7. There is also a possibility that respondents may seek to immediately remove the respondent from the United States.

8. After I submit this declaration I intend to personally proceed to the ICE building at 4310 S. Macadam Street, Portland Oregon, to attempt to speak with the petitioner and gather further information. If I learn anything material to this action, I will inform the court by a supplemental declaration.

9. On June 24, 2025, starting at 10:10 a.m., I spoke with the assigned duty attorney for the U.S. Attorney's office for the District of Oregon, Mr. Kemp Strickland. I informed Mr. Strickland that I had filed the petition for habeas corpus on behalf of the petitioner and that I would be seeking a temporary restraining order.

10. Immediately after the telephone call with Mr. Strickland I sent to him a copy of the petition for habeas corpus, which during our telephone call, he had indicated he would pass along to the appropriate person in his office.

Dated this 24th day of June 2025

/s/ Michael T. Purcell

MICHAEL T. PURCELL
OSB #853094
Attorney for petitioner