

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LILIANA DEL CISNE RUEDA TORRES

Petitioner,

v.

LaDeon FRANCIS, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of Homeland Security; and Pamela BONDI, in her official capacity as Attorney General of the United States,

Respondents.

No. 25-CV-8408 (DEH)

DECLARATION OF MELISSA LIM CHUA IN SUPPORT OF PETITIONER'S REPLY MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR HABEAS CORPUS

I, Melissa Lim Chua, upon my personal knowledge hereby declare, as follows:

1. I am an attorney duly admitted to practice in the State of New York.
2. I am the Director of the Immigrant Protection Unit at the New York Legal Assistance Group (“NYLAG”), which represents Liliana Del Cisne Rueda Torres (“Ms. Rueda Torres”) in the above-captioned action. NYLAG is a non-profit which provides free legal services to immigrant New Yorkers experiencing poverty.
3. I make this declaration in support of Ms. Rueda Torres’s reply memorandum of law in support of her petition for habeas corpus.
4. Ms. Rueda Torres is a 33-year-old Ecuadorian national who entered the United States in September 2022.
5. Ms. Rueda Torres is the loving mother of three children—J [REDACTED] (11 years old); R [REDACTED] (nine years old); and M [REDACTED] (two years old). M [REDACTED] is a U.S. citizen. Prior to her

detention, Ms. Rueda Torres lived with her husband and her three children in New York, New York.

6. On February 21, 2025, Ms. Rueda Torres was arrested and charged with Attempted Petit Larceny (PL 155.25) and Attempted Criminal Possession of Stolen Property in the Fifth Degree (PL 165.25). On March 17, 2025, the New York County District Attorney's Office declined to prosecute the February 21, 2025 charges against Ms. Rueda Torres.
7. Ms. Rueda Torres was re-detained by ICE on October 9, 2025, after attending her fourth hearing in immigration court. Upon her re-detention, ICE separated Ms. Rueda Torres from her husband and her two-year-old child, M [REDACTED] who was in a stroller.
8. NYLAG was retained as *pro bono* counsel to represent Ms. Rueda Torres on October 28, 2025.
9. Ms. Rueda Torres is currently detained in South Louisiana Processing Center. Since being retained, NYLAG has had two confidential attorney meetings via zoom and two non-confidential phone calls. Each confidential attorney call was one-hour in duration.
10. Ms. Rueda Torres's three children and husband have struggled emotionally since her detention. The children miss their mother incredibly have missed her presence and her cooking at home.
11. Prior to her detention, Ms. Rueda Torres worked consistently as a machine operator at NAP Industries, which makes plastic packaging.
12. Before her detention, Ms. Rueda Torres and her family regularly attended a Christian church between one and two times a week. Ms. Rueda Torres was a regular and active member of the church and contributed immensely to the church community.

13. Exhibit 1 is a letter from the New York County District Attorney's Office, dated October 30, 2025, confirming that on March 17, 2025, the District Attorney declined to prosecute the February 21, 2025 charges against Ms. Rueda Torres.

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

Executed in New York, New York on November 7, 2025



Melissa Lim Chua