

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

E.J.C.C., a minor, by and through his next
friend and attorney, Beth Baltimore,

Petitioner-Plaintiff,

Case No. 25-cv-08805 (CS)

v.

William JOYCE, in his official capacity as
Acting Field Office Director of New York,
Immigration and Customs Enforcement; Todd
LYONS, in his official capacity as Acting
Director U.S. Immigration and Customs
Enforcement; Kristi NOEM in her official
capacity as Secretary of Homeland Security;
Robert F. KENNEDY, JR. in his official
capacity as Secretary of Health and Human
Services; Angie SALAZAR, in her official
capacity as Acting Director of the Office of
Refugee Resettlement; Joseph B. EDLOW, in
his official capacity as Director of U.S.
Citizenship and Immigration Services; U.S.
Department of Homeland Security; U.S.
Immigration and Customs Enforcement; U.S.
Department of Health and Human Services;
U.S. Office of Refugee Resettlement; U.S.
Citizenship and Immigration Services.

Respondents-Defendants.

DECLARATION OF BETH BALTIMORE

I, Beth Baltimore, declare the following under 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

1. The facts set forth in this declaration are based on my personal knowledge, and if called to testify as a witness, I would testify thereto. I am over eighteen years of age and am of sound mind to declare the facts stated therein.

2. I am the Deputy Director of The Door’s Legal Services Center. I represent Petitioner, E.J.C.C., in this case, as well as in a guardianship petition filed in Bronx Family Court on November 4, 2025.

3. Additionally, I was recently retained as E.J.C.C.’s immigration counsel. Within the immigration administrative process, I am exploring a motion to reopen and rescind his removal order that was issued after his counsel withdrew on the day of the individual asylum hearing in immigration court.

4. Attached hereto as exhibits are true and correct copies of the following:

Exhibit	Document
1	Standby Guardianship, completed August 3, 2025
2	Bronx Family Court Order Appointing Juan B. Yupa Camas as Guardian of the Person, dated November 12, 2025
3	Letters of Guardianship of the Person of a Minor, dated November 12, 2025

Executed on this 12th day of November 2025,
in Brooklyn, New York



Beth Baltimore