

Declaration

I, Karen Weinstock, hereby state under penalty of perjury of the laws of the United States that the following statement is true and accurate:

1. I am the attorney of record in this case and providing this statement in connection with case number 1:25-cv-06037-ELR-JEM.
2. I reviewed the records of filing and the correct time and date that this case was filed with NDGA on 11:22:57 ET (23:22) on October 21, 2025 as the fee payment indicates (the receipt was emailed to my local counsel Helen Vargas Crebas on 23:23 or 11:23 p.m.) and I am attaching a true copy of the filing receipt hereto. I did not file it on 01:00 a.m. on the 21st as I had indicated in the hearing, it was filed at 23:22-23:23 p.m. that same night of October 21. I confused this filing time with another case as I have filed over a dozen federal habeas cases in the past weeks many of them required filings late into the night or early mornings. I truly apologize for this error, it was not intentional. It is my practice to check the ICE inmate locator online status each time before filing a habeas case to ensure it is filed in the correct location. ECF 1-1 is the ICE inmate locator my staff or I printed on 3:57 p.m. on the same day (October 21) showing "Call ICE for Details" under "Current Detention Facility" location at which time he was still located at 180 Ted Turner SW in Atlanta.

/s/ Karen Weinstock
Karen Weinstock
770-913-0800

October 29, 2025
Date