

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

Sukhwinder Singh,

Petitioner,

v.

Pamela Bondi, Attorney General,

0:25-cv-4477

Kristi Noem, Secretary, U.S. Department of  
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of  
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Daren K. Margolin, Director for Executive  
Office for Immigration Review,

Executive Office for Immigration Review,

David Easterwood, Acting Director, St. Paul  
Field Office, Immigration and Customs  
Enforcement,

and,

Eric Tollefson, Sheriff of Kandiyohi County.

Respondents.

**DECLARATION OF  
GABRIELA ANDERSON IN  
SUPPORT OF  
SUKHWINDER SINGH'S  
PETITION FOR WRIT OF  
HABEAS CORPUS**

I, Gabriela Anderson, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney licensed in Minnesota. My attorney's license number is 0504395. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My phone number is 612-436-7100.
2. I am admitted to practice before the U.S. District Court of Minnesota. My admission is in good standing.
3. I attach as Exhibit A, a true and correct copy of the relevant sections of H.R. Rep. No. 101-469 Part 1 (1996).
4. I attach as Exhibit B, a true and correct copy of Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 FR 10312, 10323, 62 FR 10312-01, 10323 (March 6, 1997).
5. I attach as Exhibit C, a true and correct copy of Immigration and Customs Enforcement Policy No: 11088.1 Implementation of Migrant Protection Protocols (February 12, 2019).
6. I attach as Exhibit D, a true and correct copy of the INS Memorandum of Detention Guidelines, Effective October 9, 1998, AILA Doc No. 98100791.
7. I attach as Exhibit E, a true and correct copy of Immigration and Customs Enforcement ERO 11301.1 Bond Management Handbook (August 19, 2014).

I hereby declare under penalty of perjury that everything in this declaration is true and correct.

Respectfully submitted,

/s/ Gabriela Anderson  
Gabriela Anderson, Esq.  
Minnesota Attorney Lic. No. 0504395  
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Minneapolis, Minnesota 55406  
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Email: ganderson@wilsonlg.com

November 26, 2025  
Date