

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

EVELIN JOSEFINA PEREZ,

S. 
A minor,

Case No. 2:25-cv-13931-
RJW

Petitioners,

v.



KEVIN RAYCRAFT, Acting Field Office
Director of Enforcement and Removal
Operations, Detroit Field Office, Immigration
and Customs Enforcement; **KRISTI NOEM**,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; **PAMELA BONDI**,
U.S. Attorney General; EXECUTIVE OFFICE
FOR IMMIGRATION REVIEW.

Respondents.

GEORGE B. WASHINGTON (P 26201)
SCHEFF & WASHINGTON, PC
24525 Southfield Road—Ste 270
Southfield, MI 48075
313-963-1921
313-715-4886 C
scheff915@gmail.com

**DECLARATION OF PETITIONERS' COUNSEL REGARDING
LOCATION OF PETITIONERS AND SERVICE OF THE
TEMPORARY RESTRAINING ORDER**

George B. Washington, being first duly sworn hereby deposes and states as follows:

1. I am a citizen of Michigan competent to testify in its Courts. If called as a witness, I could testify as the facts set forth in this Declaration upon my own personal knowledge, except where it is indicated that the statements are made upon information and belief.
2. At 8:12 P.M. on December 8, 2025, I was advised by an email from Assistant United States Attorney Zak Toomey that Border Control had transferred the Petitioners to Texas (Ex. 1).
3. The above information is consistent with the information that I received from a Spanish speaking co-counsel who confirmed that the Petitioner  had called a US citizen friend in Michigan stating that he and his mother had been sent to Washington, D.C. and then to Texas.
4. As to service of this Court's Order to Show Cause and the events leading to this Petition, the following is the information available to counsel as of this date and time to the events on Monday, December 8, 2025.
5. 2:04 P.M. Upon information and belief,  called Itzyrery Maydalis Ramos Monroy (US citizen friend of S. Perez and relayed by

Spanish speaking co-counsel) saying S. Perez reports being in Michigan but that he and his mother are being sent to D.C. at 5 P.M. and then Texas. Time of phone call verified by Ms. Monroy's I-phone.

6. 2:10 P.M. ECF confirms Petition (ECF No. 1) filed in Eastern District of Michigan.
7. 2:38 P.M. Email from Petitioners' counsel to AUSA Zak Toomey advising of lawsuit and request for temporary restraining order. Email requests return call (Ex. 2).
8. 2:45 P.M. (approx.). Return call from AUSA Toomey and request by him for copy of Petition.
9. 2:46 P.M. Email from Petitioners' counsel to AUSA attaching copy of Petition by AUSA during phone call (Ex. 3)
10. 3:19 P.M. ECF transmits Motion for Temporary Restraining Order (ECF No. 2) filed in Eastern District of Michigan.
11. 3:54 P.M. Email from Petitioners' counsel to AUSA Toomey saying Judge White considering TRO and request not to put petitioners on plane while that is pending (Ex. 4).
12. 4:02 P.M. ECF transmits Order to Show Cause issued by Court.

13.4:09 P.M. Email from Petitioners' counsel to Toomey with copy of the Order to Show Cause and requesting that he accept service of Order to Show Cause (Ex. 5).

14.4:25 P.M. Email received from AUSA Toomey acknowledging receipt of Order to Show Cause (Ex. 6).

15.4:48 P.M. Email received from AUSA Toomey saying that Petitioners may be custody of Customs and Border Protection (Ex. 7).

16.5:03 P.M. Email from Petitioners' counsel to Customs and Border Control with copy of Order to Show Cause (Ex. 8).

17.5:06 P.M. Email from Petitioners' counsel to Detroit ICE advising Of Petition and Order to Show Cause (Ex. 9).

I hereby declare under the pains and penalties of perjury that the above information is true and correct. Executed in Southfield, Michigan on December 9, 2025 at 12:25 P.M.

/s/ George B. Washington
GEORGE B. WASHINGTON

Dated: December 9, 2025

CERTIFICATE OF SERVICE

I have filed the above Declaration with the Court through its ECF system. I have also sent a copy of this Declaration to AUSA Zak Doomey at the email address we have used to communicate with each other.

/s/ George B. Washington
GEORGE B. WASHINGTON

Dated: December 9, 2025