

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Olga Janneth Pilataxi Palta,

Petitioner,

v.

Pamela Bondi, Attorney General,

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

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

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

Respondents.

Case No. 0:26-cv-928

**DECLARATION OF THOMAS  
C. BROCK IN SUPPORT OF  
PETITIONER'S EMERGENCY  
MOTION TO SHOW CAUSE**

I, Thomas C. Brock, state under penalty of perjury as follows:

1. I am one of the attorneys for Petitioner Olga Janneth Pilataxi Palta and make this declaration on personal knowledge.

2. Attached to this Declaration as **Exhibit 1** is a true, correct, and complete copy of my email correspondence with Respondents' counsel, Julie T. Le, and ICE.

3. As of this filing, I have received no response to my email to Ms. Le and ICE at 12:23 a.m. on February 3, 2026.

I declare under penalty of perjury that foregoing is true and correct.

Executed on February 3, 2026, in Hennepin County, Minnesota.

*/s/ Thomas C. Brock*

Thomas C. Brock