

# Exhibit A

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

**DECLARATION OF ELMER ONAN SANCHEZ HERNANDEZ**

I, Elmer Onan Sanchez Hernandez, declare as follows based upon my personal knowledge:

1. My name is Elmer Onan Sanchez Hernandez. I was born in Honduras on April 1, 1978. My wife's name is Alyse Sanchez, and we married on August 7, 2013, and live at 10225 Frederick Ave. Apt. 514. I work for a home remodeling company called Sanchez Painting and Remodeling LLC. We have two U.S. citizen children together: Aaron, who is three years old born on September 16, 2015, and Matthew who is two years old born on July 27, 2017.

2. I was ordered removed on September 6, 2005 because I was never notified of my immigration hearing. My immigration lawyer tried to reopen my case, but it was denied by the immigration court in Harlingen Texas on June 3, 2019. I have no other option to obtain a Green Card except to go through the provisional waiver process, beginning with an I-130 petition for alien relative, then file for an I-212 application for permission to reenter the U.S., and then an I-601a provisional waiver of unlawful presence. My submitted I-130 petition was received by USCIS on September 4, 2018, and on May 7, 2019 my wife and I went to the marriage interview. I have completed the I-212 documents and am planning to file it soon.

3. At the marriage interview on May 7, 2019, we were accompanied by our immigration lawyer and an interpreter so that I could fully understand all the complicated legal issues that were being explained during the interview. The USCIS officer asked us questions and approved our I-130.

4. My wife was then escorted out of the room because the USCIS officer said that he needed a supervisor to come and authenticate the case. However, instead of a supervisor, there

were ICE officers who came to arrest me. They asked how long I've lived here, which I responded saying 14 years. They put me in handcuffs and wouldn't let me see my wife or say goodbye.

5. I was brought to the Frederick County Adult Detention Center, where I was placed in solitary confinement for a few days, and I still don't know why. When I was moved to another room, I was locked up in a small jail cell that housed four of us. I was there for four or five days, and the only thing I could do was eat and sleep. Sometimes, officers would bring us food at about 5 o'clock in the morning and would be given ten minutes to eat it. Since it was so early in the morning, I was very sleepy and didn't eat the food quickly enough, so the officer would take the food and throw it in the trash.

6. I was then transferred to a detention center in Pennsylvania, and then to the Alexandria Staging Facility in Alexandria Louisiana. At the detention center in Louisiana, I was given two sandwiches in the morning, two at lunch, and two at dinner. The food was rotten and the milk that we were given to drink was spoiled. The lights were always on, they wouldn't let us shower, and it was always freezing cold because the air conditioning was turned on really high. The guards were wearing jackets and we had to use two blankets to stay warm because it felt like we were standing outside in the winter.

7. The conditions of my detention were psychological torture. I could tell ICE was deliberately making it unbearable.

8. There were television screens that constantly played videos of President Trump speaking to how he was going to deport everyone. They make you feel like you're finished, like there is no hope.

9. By the tenth day that I was in detention, I was told that I would be put on an airplane back to Honduras, and the psychological torture made thank God that I would at least be out of detention because I couldn't take it anymore.

10. After my case was filed, ICE brought me back to Maryland and released me on an order of supervision on June 19, 2019.

11. Now that I am back home, I can't really believe it's real. I am so terrified that I will be put back in immigration detention and taken away from my wife and children. When I finally came home and my kids saw me for the first time since ICE arrested me, they ran to me yelling "Papi, papi!!" They don't understand what had happened, Alyse kept telling them I was at work or that I would be home soon when they asked her why I wasn't there to tuck them in. When I was in Frederick at the immigration jail, they couldn't understand why they couldn't hug me, instead of only being able to talk to me through a glass window.


12. ICE treated me like a murderer, like I committed some horrible crime. Why am I treated that way if all I want to do is to be with my family and live here in peace?

13. Today, I feel different. I feel sad and anxious because of what happened. It's another world in immigration detention. Since coming home, I have the kids playing in another room with the television on at a low volume because I want to be able to hear what is happening outside of the apartment door. I'm petrified of being taken from my family again. That is the level of fear that I feel.

14. The detention felt like psychological torture, but being separated from my family was extremely traumatic for me. That will always stay with me.

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

Executed on August 3, 2019

  
\_\_\_\_\_  
Elmer Onan Sanchez Hernandez

# Exhibit B

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

**DECLARATION OF JEAN CLAUDE NANA**

I, Jean Claude Nana, declare as follows based upon my personal knowledge:

1. My name is Jean Claude Nana. I was born in Cameroon on March 5, 1981. My wife and I got married in Prince George's County, Maryland on April 14, 2017. We have known each other since about 2012 or 2013, after meeting at a mutual friend's birthday party. Our previous address was 5613 Kennedy St. Apt. 201 Riverdale, MD 20737, but my wife has had to leave and move in with her parents due to my near ten-month detention. We have no children, but we both have younger siblings who we treat as if they were our own child.

2. I used to work at Georgetown University Hotel as a maintenance engineer but lost my job while I was in immigration detention.

3. I entered the U.S. with a B-1 visa on April 19, 2011, traveling through Gabon. I was claiming asylum based on fear of persecution for my political opinion, but was denied and was ordered removed on May 3, 2016. I appealed the decision to the Board of Immigration appeals and my appeal was denied on February 17, 2017. I appealed the BIA denial to the U.S. Court of Appeals for the Fourth Circuit but my appeal was denied on October 12, 2017. When my order of removal became final after my appeal to the U.S. Court of Appeals for the Fourth Circuit, my only option was to pursue legal status through my wife, who is a naturalized U.S. citizen. My wife petitioned on my behalf by filing an I-130 on June 1, 2017 and USCIS received our I-130 petition on September 12, 2017. I filed a Motion to Reopen in immigration court to reopen and challenge the removal order that was ordered against me, but the motion was denied because there was no decision yet on my I-130. I still have not received a decision on my I-130

petition. My only option now is to receive a Green Card and regularize my immigration status through the provisional waiver process.

4. My wife and I went to the I-130 marriage interview on August 22, 2018 at the Baltimore USCIS Office at 3701 Koppers Street. Our immigration lawyer informed us that we would simply be answering questions about our marriage to assist in the I-130 application and that no action would be taken at this stage of the process. After my interview I was brought to another room where I was told I would be fingerprinted, but instead two armed ICE officers arrested me and placed me in handcuffs. After I was taken away, my immigration lawyer left the room to tell my wife what had happened. I was extremely confused and when the officers arrested me and said they could deport me. I was never fingerprinted and I was never given the chance to say goodbye.

5. I was held in immigration detention for nearly ten months, and was released on June 14, 2019. Two days before, I was brought to the Baltimore ICE office and they told me that I was going to be deported soon. After speaking with my lawyers, it seems like something changed and ICE decided to let me go on June 14. They released me with an order of supervision.

6. While I was in detention, my wife tried to call me every night, but I was nevertheless extremely lonely since she could not visit me. She does not have a driver's license so she could not drive up to the Frederick County Adult Detention Center where I was being held. We both are very distrustful of the process now, and are unsure whether we should trust the process moving forward, but we must continue or else I won't receive a Green Card.

7. My wife has also endured significant financial hardship as I was the breadwinner of our family. My employment authorization expired while I was in detention, and even though



I've been released, I still cannot work and support my family. The stress from this causes me emotional anxiety.

8. My family and I are afraid that I might be taken away from my family again, and my family will be left alone to handle the economic and emotional trauma this situation has caused us. As the breadwinner and protector of my family, this worries me and makes me feel helpless.

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

Executed on June 06/24/, 2019

A handwritten signature in black ink, consisting of a stylized 'J' followed by a series of loops and a final vertical stroke.

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Jean Claude Eyeghe-Nana

# Exhibit C

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

**DECLARATION OF AMIRA ABBAS ABDALLA**

I, Amira Abbas Abdalla, declare as follows based upon my personal knowledge:

1. My name is Amira Abbas Abdalla. I was born in Sudan on February 21, 1984. My husband's name is Jean Claude Nana. Jean Claude and I married on April 14, 2017 in Upper Marlboro, Maryland. We met at my best friend's birthday party in 2012 or 2013 and were friends ever since. I am a security officer at Allied Universal Baltimore and am a naturalized U.S. citizen. I was naturalized on December 10, 2014 and first entered the United States on September 11, 1998 with my parents as a refugee. I currently live at 645 S Avondale Rd Baltimore, MD 21222 in Baltimore City County with my parents because I could not afford the apartment Jean Claude and I rented together by myself. I previously lived with my parents at 9107 5th St. Lanham, MD 20706 in Prince George's County but we recently downsized due to the financial strain of Jean Claude's detention.

2. Jean Claude and I attended our I-130 marriage interview with USCIS on August 22, 2018, not knowing that we would be separated for nearly ten months. The USCIS officer told us he did well and that he would be taken for fingerprinting. Instead, while I waited in the lobby for what I thought was for him to be fingerprinted, he was arrested by ICE officers and taken to immigration detention. He was taken away and I wasn't even able to say goodbye, and I cried right there in the hallway unsure of what to do next.

3. I lost sleep while we were separated, worried that I would never be able to see him again. We tried to talk almost every night and deeply missed each other. We trusted the system to follow its own protocol and never expected Jean Claude was about to be arrested rather

than fingerprinted. Everyone in my husband's life attests to his humility, friendly, and kind-hearted character and is shocked that something so traumatic could happen to us.

4. His detention has caused significant hardship to Jean Claude's community and our family, who all adore Jean Claude. He used to play soccer and did karate with friends. I was only able to speak with Jean Claude on the phone because I do not have a driver's license and could not visit him. I also have to take care of my siblings and Jean Claude's siblings on my own, and have to look for an additional job to make up for Jean Claude's lost income.

5. Our family has felt completely distressed from Jean Claude's detention and near deportation. My mother loves Jean Claude and felt powerless to help him. Jean Claude's younger brother and my seven-year-old little sister both adore Jean Claude, and he helped take care of them emotionally and financially. Before Jean Claude's detention, we supported his brother while he was taking classes in college, but while Jean Claude was detained, his brother had to find a job in order to support himself. Jean Claude's brother has lost faith in the legal system because of what's happened, and is still visibly upset. My sister is also still visibly upset that Jean Claude was taken away from us.

6. I suffered as well because of my husband's arrest. I had to leave our old home and move back in with my parents because I could not afford our apartment without Jean Claude. Without my parents, I would have been homeless because there is no one else I could rely on for housing during his detention. The loss of Jean Claude's income has also forced my parents to move into a smaller home because they rely on our income as well. I have already begun working more hours to take care of myself, but because Jean Claude was separated from us for so long, the financial hardship was significant. Since Jean Claude was held in detention for nearly ten months, he has to apply for work authorization and try to find another job.

7. We are grateful that Jean Claude is back home with us after he was released on June 14, 2019, and we are trying very hard to pick up the pieces that we were left in after he was arrested and detained. I am still worried that they will find another reason to arrest him and take him away from us. This entire experience has been emotionally draining, but we must continue forward with the immigration process so he can receive a Green Card and so we may finally live together in peace.

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

Executed on June 25, 2019

Amira Abdalla  
Amira Abbas Abdalla

# Exhibit D



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

**DECLARATION OF THERESA RODRIGUEZ PEÑA**

I, Theresa Rodriguez Peña, declare as follows based upon my personal knowledge:

1. My name is Theresa Rodriguez Peña. I was born in January 1976 in the United States and am a U.S. citizen. I married my husband, Misael Rodriguez Peña, born in November 1980, on March 8, 2010. We have been married for nine years, and live in Maryland. I am employed as a clerk at Royal Farms in Baltimore, Maryland, and Misael has worked in the construction industry and in restaurants in Maryland. We have four U.S. citizen children together: Misael Jr., who is ten years old; Luis, who is nine years old; Sofia, who is six years old; and EliAna, who is four years old. My two stepchildren – Misael’s children from a prior relationship – also live with us and are under our care: Maria, who is sixteen years old and Kevin, who is fourteen years old.

2. In 2007, I met my husband Misael through a mutual friend. We fell in love, married, and now have four children together. All six of our children live with us and rely on us for care. We wish to support them and give them opportunities that we did not have.

3. Misael has a final order of removal that was issued to him *in absentia*, on August 10, 2005 from an immigration court in San Antonio, Texas.

4. Misael is eligible for a Green Card through the provisional waiver process, as the spouse of a U.S. citizen. On March 26, 2018, I submitted an I-130 petition, the first step of the process, to the United States Customs and Immigration Services (“USCIS”) office in Baltimore. Our interview was scheduled for May 6, 2018 at 7:30 AM. Prior to the interview, our attorney, Mikhael Borgonos of the Esperanza Center of Catholic Charities in Baltimore, informed us of

reports that Immigration and Customs Enforcement (“ICE”) officers were arresting potential I-130 beneficiaries such as Misael during their marriage interviews. This made us both very anxious and fearful. We decided that for the marriage interview scheduled for May 6 that Mr. Borgonos and I would attend without Misael, for fear that he might be arrested, detained, and deported.

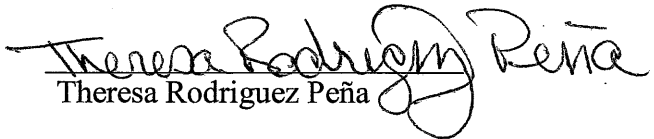
5. On May 6, 2019, the I-130 interview appointment began at 8:03 AM. Our interviewer, Officer Byrd, asked me where Misael was and I informed him that he could not come, and Mr. Borgonos stepped in and told Officer Byrd that Misael had decided not to attend the interview because USCIS and ICE have a practice of arresting people at their marriage interviews. He also said to Officer Byrd that USCIS has created a chilling effect for beneficiaries to attend these interviews by detaining and removing individuals with final orders of removal.

6. I started to explain the bona fides of our marriage, when we were interrupted by Officer Byrd’s supervisor, Ms. Baker, who halted the interview because Misael was not there. She again asked where my husband was, but I could not respond because I was so nervous and afraid that I began to cry. Mr. Borgonos spoke in my stead and informed Ms. Baker that Misael had not come because he was afraid that he would be arrested at the interview. He further informed Ms. Baker that, per the recent ruling in *Lin v. Nielsen*, USCIS could not use the I-130 interview as a trap to detain and remove potentially eligible applicants. Ms. Baker stated that Misael had a pending removal order from 2005 and Mr. Borgonos explained that the removal order was not relevant for the purpose of an I-130. It really felt like at that moment, had Misael been there, he would have been taken away from me and my family. Officers Byrd and Baker ended the interview a mere 30 minutes after it began, and we were not allowed to present any more information about the bona fides of our marriage.

7. I remain extremely anxious and fearful that, because my husband was not there at the interview, our I-130 petition will be denied and we will have to go through the process again and risk arrest if we ever hope to get Misael a Green Card. I would be devastated if Misael were deported back to Honduras. My children are very scared that their father might be separated from us, and we don't know what to do if we cannot go through the provisional waiver process to get my husband a Green Card. We live in fear of the increased immigration raids we hear on the news. It scares me that we won't have the chance to keep our family together through existing immigration laws, when my husband has this available path to legal status. We talk often about this incident and the children cry because they are worried that their father may be taken away any day. I worry daily about the psychological toll that this is taking on all of us.

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

Executed on July 25, 2019

  
Theresa Rodriguez Peña

# Exhibit E

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

**DECLARATION OF OLIVIA ALDANA**

I, Olivia Aldana, declare as follows based upon my personal knowledge:

1. My name is Olivia Aldana. I was born in August 1994 in the United States. I married my husband, Jose Carlos Aldana-Martinez, born on January 12, 1985, on February 24, 2018. We have been married for about a year and a half, and live in Maryland. I am employed at a Dunkin Donuts, and Jose Carlos is a Manager at Outback Steakhouse. Jose Carlos was born in Mexico. We have one U.S. citizen child together: Elizabeth, who was born in November 2018, and is eight months old. We are also caregivers for Jose Carlos' son – and my step-son – Liam, who was born in December 2011 and is seven years old. Since he was a toddler, Liam has dealt with developmental delays, ADHD, anxiety, and depression, and requires specialized services and care. He has attended speech, occupational, and behavioral therapy appointments since he was three years old.

2. We met in June of 2017, when I interviewed for a position at the Outback Steakhouse, where Jose Carlos is the manager. Even though I left the position, we began seeing one another, fell in love, and married soon after. We are the primary caregivers for our infant daughter, Elizabeth, and we spend a significant amount of time ensuring that our son Liam gets the care he needs.

3. Jose Carlos tried to obtain cancellation of removal in immigration court, but was denied because the judge found that he did not meet the continuous presence requirement. He was issued a final order of removal by Judge Williams of the Baltimore Immigration Court on March 6, 2018.

4. As the spouse of a U.S. citizen and not currently in removal proceedings, Jose Carlos is eligible for the provisional waiver process. On May 21, 2018, I submitted an I-130 petition to the United States Customs and Immigration Services (“USCIS”) office in Baltimore. Our interview was scheduled for June 14, 2019. Prior to the interview, our attorney Steven Planzer of the law firm Castaneda Planzer in Salisbury, Maryland, informed us of reports that Immigration and Customs Enforcement (“ICE”) officers were arresting potential I-130 beneficiaries during their marriage interviews. This made me and Jose Carlos very anxious and fearful. We decided that I would attend the marriage interview scheduled for May 6 without Jose Carlos, for fear that he might be arrested, detained, and deported.

5. During the I-130 interview on June 14, 2019, I informed our interviewer that Jose Carlos was not present because he had to be at work. Our interviewer did not ask any additional questions and ended the interview. I was given a piece of paper and told to write down that my husband could not be there and that USCIS would need to reschedule the interview. I wrote this down and left the statement with a woman at the front desk.

6. Before leaving, I told the interviewer that I was worried that Jose Carlos would be arrested at a future interview. The interviewer informed me that my husband would have to attend the rescheduled interview and that USCIS could not arrest anyone because they had no authority to do so, but did not say anything about ICE arresting people. Our interview has not yet been rescheduled. Since I was not allowed to continue the interview and prove the bona fides of our marriage, we will have to have another interview and are simply waiting on a rescheduled date.

7. Both Jose Carlos and I remain extremely anxious and fearful that he might be deported. We have trouble sleeping at night due to the constant worry that Jose Carlos will be

deported, leaving me to raise our infant daughter on my own. Jose Carlos is also paranoid that he will be arrested any time he leaves the house to go to work or pick up our son from his weekly therapy appointments. We are afraid to tell our son Liam that his father might be deported because he would likely feel scared and confused. In the last two years, Liam has made great strides in his development through therapy, and losing his father – the adult figure he trusts the most – would set him back significantly. In addition, Jose Carlos is the primary breadwinner in our family. His paycheck covers our most essential expenditures – rent, utilities, the car payment, and food – while my much smaller paycheck goes towards miscellaneous expenses. Without Jose Carlos, we would be at risk of becoming homeless. I am terrified that he will be taken away from our family.



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

Executed on July 30, 2019

A handwritten signature in black ink, appearing to read 'Olivia Aldana', written in a cursive style.

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Olivia Aldana

# Exhibit F

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

**DECLARATION OF MWITI MURITHI**

I, Mwiti Murithi, declare as follows based upon my personal knowledge:

1. My name is Mwiti Murithi. I was born in May 1985 in Kenya. I married my wife, Tatyana Murithi, on May 23, 2014. We have been married for five years, and live in Maryland. I am a Technician at a pathology lab in Maryland that processes samples for skin cancer diagnosis and treatment. Tatyana is a Human Resources Generalist at Mary's Center, a community health center in Washington, DC. Tatyana was born in America and is a United States citizen.

2. I met Tatyana in 2009. We were introduced by her sister, who was a classmate of mine at the time. We began dating two years later, fell in love, and got married on May 23, 2014.

3. I came to the United States on an A-3 employment visa in July of 2004 to work as a domestic servant for a Kenyan diplomat. In 2006, while I was working, I enrolled as a student at Montgomery College and in 2008, after my employment with the Kenyan consulate ended, I transferred to the University of Maryland at College Park to study cell biology and molecular genetics. I received my F-1 student visa on August 12, 2009.

4. In 2010, while I was in school, I fell behind on my tuition and could not continue my studies at UMD College Park, breaching my visa and triggering removal proceedings. ICE arrested me on June 28, 2010, but I was released soon after with a tracking monitor. I was granted voluntary departure by the immigration judge on December 8, 2010, and my ankle monitor was taken off, but I never departed.

5. Because I failed to depart the country, my voluntary departure order was converted to a final removal order on April 7, 2011. I was arrested on the evening of November

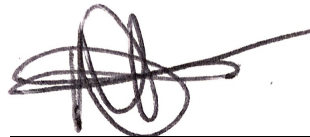
3, 2011 and detained at the Frederick County Detention Center for nine months before being released by ICE on August 17, 2012 on an order of supervision due to their inability to obtain travel documents for me. I was able to gather enough funds so that I could re-enroll in school and graduated with a Bachelor of Science in Molecular Biology and Genetics in May of 2017.

6. As the spouse of a U.S. citizen, I am eligible for a Green Card through the provisional waiver process. On July 2, 2018, Tatyana submitted an I-130 petition to the United States Customs and Immigration Services (“USCIS”) to the Potomac Regional Service Center in Arlington, VA, and the petition was transferred to the local USCIS field office in Baltimore. Our interview was initially scheduled for June 7, 2019. Prior to the interview, my attorney Eric Singer of Singer Immigration Law Firm in Bethesda, Maryland, informed us of reports that Immigration and Customs Enforcement (“ICE”) officers were arresting potential I-130 beneficiaries during their marriage interviews. This made me and Tatyana very anxious and fearful. Tatyana and I decided to postpone the interview out of concern that I might be arrested and to try and gather more evidence to prove the bona fides of my marriage with Tatyana. Mr. Singer also had a medical appointment that morning that conflicted with the interview and I needed my lawyer with me at the interview. We have not yet received a notice that the interview has been rescheduled, but expect that it will be soon.

7. Both Tatyana and I are very worried that I will be deported. The thought of being separated from Tatyana makes me very anxious and upset. Tatyana and I want to start a family together, but we have put off having children until later because we do not want to subject them to the fear that I might be deported and the instability that would result.

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

Executed on July 31, 2019

A handwritten signature in dark ink, consisting of several loops and a long horizontal stroke extending to the right.

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Mwiti Murithi

# Exhibit G

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

**DECLARATION OF ERIC NDULA**

I, Eric Ndula, declare as follows based upon my personal knowledge:

1. My name is Eric Ndula. I was born in February 1965 in Cameroon. I married my wife, Bibiana Ndula, on August 21, 2015. We have been married for almost four years, and live in Maryland. I am a Machine Operator for a manufacturing company in Baltimore. Bibiana is a Registered Nurse at Maxim Healthcare Services in Towson. She was born in Nigeria and became a naturalized United States citizen on May 14, 2010. We have two U.S. citizen children together: Laura, who was born in September 2005, and is almost fourteen years old; and Kelly, who was born in May 2009, and is ten years old. We are also the primary caregivers Bibiana's daughter – and my step-daughter – Mary, who was born in April 2001, and is eighteen years old.

2. Bibiana and I met in 2004 because we went to the same church. We fell in love and got married on August 21, 2015.

3. I came to the United States on May 14, 2000 to seek asylum. I was denied, but appealed to the Board of Immigration Appeals, which denied my petition on November 13, 2002, and the U.S. Court of Appeals for the Fourth Circuit denied my petition for review on January 13, 2004. My order of removal became final on November 13, 2002, when the Board of Immigration Appeals denied my appeal and administratively closed my case.

4. As the spouse of a U.S. citizen, I am eligible for a Green Card through the provisional waiver process. On September 21, 2017, Bibiana submitted an I-130 petition to the United States Customs and Immigration Services ("USCIS") field office in Baltimore. Our interview was initially scheduled for August 24, 2018. Prior to the interview, my attorney Mary Ann Berlin of the law firm Berlin & Associates, P.A. in Baltimore, Maryland, informed us of

reports that Immigration and Customs Enforcement (“ICE”) officers were arresting potential I-130 beneficiaries during their marriage interviews. Bibiana and I decided to postpone the interview out of concern that I might be arrested. The interview was rescheduled for September 17, 2018, but we postponed it once again because we remained anxious that I might be deported. The interview has been rescheduled for August 6, 2019. We are still fearful that I will be arrested at this upcoming interview. Ms. Berlin has informed us that she believes that if we tried to postpone this interview, the application would be considered abandoned and we would have to file a new I-130 petition.

5. Bibiana suffers from hypertension and sleep apnea and the stress caused by this situation has worsened her health. I am scared about what might happen to me if I am deported back to Cameroon, where I have not lived for years and would not be safe. I came from a region that was once a part of British Cameroon; the political situation in Cameroon has rendered the region dangerous for non-French-speaking Cameroonians like me, who are being marginalized and killed by the Francophone majority. Our children are old enough to understand what is happening and would be devastated if I were deported.



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

Executed on July 31, 2019

A handwritten signature in blue ink, reading "Eric S Ndula", is positioned above a horizontal line.

Eric Ndula

# Exhibit H

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Alyse Sanchez, <i>et al.</i> ,	)	
	)	
Plaintiffs	)	
	)	Civil No.
v.	)	
	)	
Kevin McAleenan, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DECLARATION OF PATRICIA MINIKON**

I, Patricia Minikon, declare as follows:

1. I am over eighteen (18) years of age and am competent to testify as a witness.

Unless otherwise specified, this declaration is based upon personal knowledge and information through the course of my professional duties.

2. I am an immigration attorney and my principal place of business is at 6305 Ivy Ln #422, Greenbelt, MD 20770. My office phone number is (301) 220-2280.

3. I have worked as an immigration attorney for over 25 years and have represented over 750 clients in immigration matters in Maryland.

4. Counsel in the above-captioned matter has informed me that the proposed class for this matter consists of: Any U.S. citizen and his or her noncitizen spouse who (a) has a final order of removal and has not departed the U.S. under that order; (b) is the beneficiary of a pending or approved I-130, Petition for Alien Relative, filed by the U.S. citizen spouse; (c) is not "ineligible" for a provisional waiver under 8 C.F.R. § 212.7(e)(4)(i) or (vi); and (d) is within the jurisdiction of Baltimore ICE-ERO field office (*i.e.*, the state of Maryland).

5. I am aware of at least three (3) cases from within the last two years in which I have represented a client who (a) has a final order of removal and has not departed the U.S. under that order; (b) who is the beneficiary of a pending or approved I-130 filed by a U.S. citizen spouse; (c) who is not ineligible for a provisional waiver under 8 C.F.R. § 212.7(e)(4)(i) or (vi); and (d) resides in Maryland.

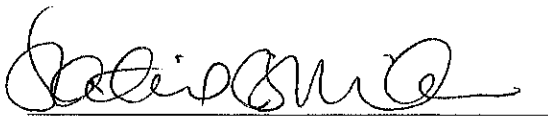
6. I have had one client who attended an I-130 interview to pursue a provisional waiver and was arrested and detained by Immigration and Customs Enforcement ("ICE") at the interview. This client had been ordered removed prior to his I-130 interview.

7. Since discovering that ICE is arresting immigrants with final orders of removal at their I-130 interviews, I have had to warn clients and prospective clients of this possibility and those affected have expressed fear when deciding whether to continue with the process and frequently do not.

8. I am aware of at least 20 clients who have not pursued a provisional waiver or attended an I-130 interview out of fear that pursuing a provisional waiver or attending an I-130 interview would lead to his or her detention or removal.

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

Executed on July 2, 2019

  
Patricia Minikon