

# **EXHIBIT 8**

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