

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

)	
Wanrong Lin, et al.,)	
)	
Plaintiffs-Petitioners,)	
)	Civil No. 8:18-cv-03548-GJH
v.)	
)	
KIRSTJEN NIELSEN, et al.,)	
)	
Defendants-Respondents.)	
)	

DECLARATION OF TIMOTHY W. DAVIS

I, Timothy W. Davis, 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.

2. I am the founding partner of the Law Offices of Timothy W. Davis, and have practiced immigration law for over twelve years all over the country, but mostly in Baltimore, Maryland, which is where my firm is based. We represent clients in a wide range of immigration matters.

3. 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 (i) has a final order of removal and has not departed the U.S. under that order; (ii) is the beneficiary of a pending or approved I-130, Petition for Alien Relative, filed by the U.S. citizen spouse; (iii) is not “ineligible” for a provisional waiver under 8 C.F.R. § 212.7(e)(4)(i) or (vi); and (iv) is within the jurisdiction of Baltimore ICE-ERO field office (*i.e.*, the state of Maryland).

4. I am aware of at approximately 5–6 cases from approximately the last two years in which a client from our firm (i) has a final order of removal and has not departed the United

States under that order; and (ii) is the beneficiary of a pending or approved I-130 filed by a U.S. citizen spouse. Although I have not confirmed that each of these individuals (i) is not ineligible for a provisional waiver under 8 C.F.R. § 212.7(e)(4)(i) for being under 17 years old, or under 8 C.F.R. § 212.7(e)(4)(vi) for having a separate application for lawful permanent resident status pending; and (ii) resides in Maryland, I am confident that few if any of the individuals identified would be excluded from the proposed class in this matter on that basis.

5. Since first learning that ICE is arresting immigrants with final orders of removal at their I-130 interviews, we have had to warn our clients of the possibility of arrest, and have seen the fear it creates in our clients when deciding whether to continue the process.

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

Executed on June 12, 2019



Timothy W. Davis