

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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NATIONAL DAY LABORER ORGANIZING
NETWORK, CENTER FOR CONSTITUTIONAL
RIGHTS, and IMMIGRATION JUSTICE
CLINIC OF THE BENJAMIN N. CARDOZO
SCHOOL OF LAW,

ECF CASE

10 CV 3488 (SAS)(KNF)

[Rel. 10 CV 2705]

Plaintiffs,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT AGENCY,
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
FEDERAL BUREAU OF INVESTIGATION,
and OFFICE OF LEGAL COUNSEL

Defendants.

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DECLARATION OF LISA R. PLUSH
EXHIBITS A-C

I, Lisa R. Plush, pursuant to the provisions of 28 U.S.C. § 1746, declare as follows:

1. I am an Associate at the firm of Mayer Brown LLP, attorneys for Plaintiff National Day Laborer Organizing Network.
2. I submit this declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Partial Summary Judgment and in Support of Plaintiffs' Cross-Motion for Partial Summary Judgment with Respect to Search Cut-Off Dates.
3. On November 18, 2010, the Federal Bureau of Investigation ("FBI") produced 803 pages of documents relating to the Secure Communities Program to Plaintiffs.

4. On January 17, 2011, the FBI produced an additional 216 documents to Plaintiffs relating to opt-out records.
5. Attached as Exhibit A is a true and correct copy of a redacted email, Bates stamped ICE FOIA 10-2674.0011568, produced by Immigration & Customs Enforcement ("ICE") on January 17, 2011, dated November 9, 2010.
6. Attached as Exhibit B is a true and correct copy of a redacted email, Bates stamped, ICE FOIA 10-2674.006746-47, produced by ICE on January 17, 2011, dated November 10, 2010.
7. Attached as Exhibit C is a true and correct copy of a redacted email, Bates stamped, ICE FOIA 10-2674.0011599-1602, produced by ICE on January 17, 2011, dated November 16, 2010.

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

Dated: February 9, 2011
New York, New York



Lisa R. Plush