

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
NATIONAL DAY LABORER ORGANIZING
NETWORK, et al.,

Plaintiffs,

- v -

UNITED STATES IMMIGRATION AND CUSTOMS
ENFORCEMENT, et al.,

Defendants.
----- x

Civil Action No. 10-CV-3488

DECLARATION
OF RYAN LAW

Ryan Law, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am the Deputy FOIA Officer of the Freedom of Information Act Office (the "ICE FOIA Office") at United States Immigration and Customs Enforcement ("ICE"). I have held this position since May 9, 2010. Prior to this position, I was a Senior Paralegal Specialist and Paralegal Specialist within the ICE FOIA Office beginning in February 2007. Prior to my employment with ICE, I was a FOIA Specialist within the Transportation Security Administration's FOIA Office beginning in September 2005. The ICE FOIA office mailing address is 500 12th Street, S.W., Washington, D.C. 20536-5009.

2. As the Deputy FOIA Officer, I am responsible for overseeing ICE processing of FOIA and Privacy Act requests. I assist in the management and supervision of ICE FOIA Paralegal Specialists, who report to me regarding the processing of FOIA and Privacy Act requests received by ICE. I am personally familiar with ICE's processing of the FOIA request that Cardozo Law School submitted on February 23, 2010, on behalf of the National Day Laborer Organizing Network

("NDLON"), the plaintiff in the above-captioned action. The ICE FOIA Office assigned FOIA case number 2010FOIA2674 to this request.

3. The statements contained in this declaration are based upon my personal knowledge, my review of documents kept by ICE in the ordinary course of business, and information provided to me by other ICE employees in the course of my official duties.

4. Pursuant to the Court's July 11, 2011, Order in this matter, ICE personnel involved in attorney client communications that ICE withheld from plaintiffs under FOIA Exemption (b)(5) have reviewed all such communications for the purpose of determining whether confidentiality had been maintained. Each of those personnel have responded that confidentiality has in fact been maintained.

JURAT CLAUSE

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief. Signed this 8th day of August 2011.



Ryan Law
Deputy FOIA Officer
Freedom of Information Act Office
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security