

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

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

Plaintiffs,

- against -

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

Defendants.

No. 10 Civ. 3488 (SAS)  
ECF Case

**DECLARATION OF  
CHRISTOPHER CONNOLLY**

I, CHRISTOPHER CONNOLLY, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am one of the Assistant United States Attorneys assigned to handle this case and am fully familiar with all of the facts stated herein. I make this declaration in support of the Renewed Motion for Summary Judgment on Withholdings Pursuant to Exemption (b)(5) and the Attorney-Client Privilege submitted by defendant United States Immigration and Customs Enforcement (“ICE”).

2. Attached hereto as Exhibit A is a true and correct copy of the supplemental *Vaughn* index submitted by ICE on August 8, 2011.

3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Ryan Law dated August 8, 2011.

4. Attached hereto as Exhibit C is a true and correct copy of the transcript of the conference before the Court in this matter held on August 18, 2011.

5. Attached hereto as Exhibit D is a true and correct copy of the Supplemental Declaration of Ryan Law dated August 23, 2011, and the attached exhibit.

6. Attached hereto as Exhibit E is a true and correct copy of the transcript of the conference before the Court in this matter held on August 24, 2011.

7. Attached hereto as Exhibit F is a true and correct copy of Plaintiffs' letter to the Court dated August 11, 2011, and attached exhibits.

8. Attached hereto as Exhibit G is a true and correct copy of Defendants' letter to the Court dated August 17, 2011.

9. Attached hereto as Exhibit H is a true and correct copy of Plaintiffs' letter to the Court dated August 24, 2011, and attached exhibits.

10. Attached hereto as Exhibit I is a true and correct copy of Defendants' letter to the Court dated August 23, 2011.

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

Dated: New York, New York  
September 2, 2011

s/ Christopher Connolly  
CHRISTOPHER CONNOLLY  
Assistant United States Attorney