

**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,
EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW, and OFFICE OF LEGAL COUNSEL

Defendants.

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DECLARATION OF SUNITA PATEL IN SUPPORT OF PLAINTIFFS' REPLY BRIEF

I, SUNITA PATEL, declare, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

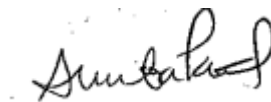
1. I am a licensed attorney at the Center for Constitutional Rights, one of the co-Plaintiffs and co-counsel in the above-captioned matter.
2. I submit this declaration in support of Plaintiffs' Reply to Plaintiffs' Cross-Motion for Partial Summary Judgment on Adequacy of Search for Defendants' Opt-Out and Rapid Production List Records, dated March 26, 2012.

3. Attached as Exhibit A is a true and correct copy of an email, Bates stamped ICE-FOIA 205342, dated January 26, 2011, produced by the Immigration and Customs Enforcement agency on March 20, 2012.

4. Attached as Exhibit B is a true and correct copy of an email, Bates stamped ICE-FOIA 201387, dated January 21, 2012, produced by the Immigration and Customs Enforcement agency on March 20, 2012.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
April 16, 2012



SUNITA PATEL