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,	No. 10 Civ. 3488 (SAS) ECF Case

Plaintiffs,

- against -

REPLY DECLARATION
OF JOSEPH N. CORDARO

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.

I, JOSEPH N. CORDARO, 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 reply declaration in further support of the motion by defendants United States Immigration and Customs Enforcement, U.S. Department of Homeland Security, Federal Bureau of Investigation, Executive Office for Immigration Review, and Office of Legal Counsel for a stay pending appeal of the Court's Opinion and Order dated February 7, 2011, and Supplemental Order dated February 14, 2011.

2.   Attached hereto as Exhibit A is a true and correct copy of an e-mail from Norman R. Cerullo, Mayer Brown, LLP to the Court's Law Clerk, dated January 13, 2011.

3.   Attached hereto as Exhibit B is a true and correct copy of a printout from the web site www.foia.gov, indicating the number of FOIA requests received by defendants during 2008, 2009, and 2010.

4.   Attached hereto as Exhibit C is a true and correct copy of a Stipulation and Order entered by the Court on April 8, 2011.

5.   Attached hereto as Exhibit D is a true and correct copy of the transcript from the hearing before the Court on March 8, 2011.

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

Dated: New York, New York
         April 11, 2011

                                          s/ Joseph N. Cordaro
                                         JOSEPH N. CORDARO
                                         Assistant United States Attorney