

**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)

**DECLARATION OF
CHRISTOPHER
CONNOLLY**

Christopher Connolly, pursuant to the provisions of 28 U.S.C. § 1746, declares as follows:

1. I am an Assistant United States Attorney in the office of Preet Bharara, United States Attorney for the Southern District of New York, attorney for defendants United States Immigration and Customs Enforcement; United States Department of Homeland Security; Executive Office for Immigration Review; Federal Bureau of Investigation; and Office of Legal Counsel.
2. I submit this declaration in support of defendants' memorandum of law in opposition to plaintiffs' motion for preliminary injunction.

3. Attached as Exhibit A is a true and correct copy of the Declaration of Catrina Pavlik-Keenan dated November 12, 2010.

4. Attached as Exhibit B are true and correct copies of the Declaration of David M. Hardy dated November 12, 2010, and attached exhibits.

5. Attached as Exhibit C is a true and correct copy of the Declaration of David J. Palmer dated November 12, 2010.

6. Attached as Exhibit D is a true and correct copy of the Declaration of Paul P. Colborn dated November 12, 2010.

7. Attached as Exhibit E is a true and correct copy of the Declaration of Crystal Rene Souza dated November 12, 2010.

8. Attached as Exhibit F is a true and correct copy plaintiffs' "Rapid Production List" and appendix dated June 25, 2010.

9. Attached as Exhibit G are true and correct copies of an e-mail from Hannah Weinstein to Christopher Connolly dated October 11, 2010, with portions redacted pursuant to Federal Rule of Evidence 408, and an attachment entitled "Search Guidance for Records Related to the Ability of States or Localities to Opt-out of or Limit Participation in Secure Communities."

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

Dated: New York, New York
November 12, 2010

/s/ Christopher Connolly
CHRISTOPHER CONNOLLY
Assistant United States Attorney