

**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,

1:10-cv-3488

Plaintiffs.

[Rel. 10-CV-2705]

v.

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

Defendants.

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**DECLARATION IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR STAY**

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 in the above-captioned matter.

2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Stay, dated November 18, 2011.

3. Attached as Exhibit A is a true and correct copy of the Declaration of Sarahi Uribe, National Campaign Coordinator for the National Day Laborer Organizing Network (“NDLON”), a co-Plaintiff in the above-captioned matter, November 18, 2011.

4. Attached as Exhibit B is a true and correct copy of the Declaration of Sameera Hafiz, Policy Director of the Rights Working Group (RWG), November 18, 2011.

5. Attached as Exhibit C is a true and correct copy of the Declaration of Michelle Fei, Co-Director of the Immigrant Defense Project (IDP) in New York City, November 18, 2011.

6. Attached as Exhibit D is a true and correct copy of the Declaration of Angela Chan, staff attorney with the Asian Law Caucus (ALC) in San Francisco, California, November 18, 2011.

7. Attached as Exhibit E is a true and correct copy of the Declaration of Laura Rótolo, a staff attorney with the American Civil Liberties Union (“ACLU”) of Massachusetts, November 18, 2011.

8. Attached as Exhibit F is a true and correct copy of the Declaration of Fred Tsao, Policy Director at the Illinois Coalition For Immigrant and Refugee Rights (“ICIRR”), November 18, 2011.

9. Attached as Exhibit G is a true and correct copy of the Declaration of Ann Benson, Directing Attorney at the Washington Defender Association Immigration Project, November 18, 2011.

10. Attached as Exhibit H is a true and correct copy of the letter, dated July 8, 2011 from Thomas M. Menino, Mayor of Boston, to Chuck Wexler, Chairman of the Department of Homeland Security’s Task Force on Secure Communities.

11. Attached as Exhibit I is a true and correct copy of the letter, dated November 17, 2011 from José E. Serrano, Member of Congress, to Barack Obama, President of the United States.

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

Dated: New York, New York  
November 18, 2011

  
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SUNITA PATEL