

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

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DETENTION WATCH NETWORK  
and CENTER FOR CONSTITUTIONAL  
RIGHTS,

*Plaintiffs,*

v.

UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCEMENT AGENCY,  
UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

*Defendants.*  
-----X

ECF CASE  
14-cv-583 (LGS)

**REPLY DECLARATION  
OF GHITA SCHWARZ**

I, GHITA SCHWARZ, 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 an attorney at the Center for Constitutional Rights, counsel for Plaintiffs in this litigation. I am admitted to practice in this Court.

2. I submit this Declaration in Support of Plaintiffs' Motion for Preliminary Injunction.

3. Attached hereto as Exhibit 1 is a true and correct copy of the letter from 28 Congressional representatives to the Office of Management and Budget, dated February 12, 2014.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Supplemental Declaration of Silky Shah, dated March 14, 2014.

5. Attached hereto as Exhibit 3 is a true and correct copy of the letter I sent via email to Assistant U.S. Attorney Natalie Kuehler, dated February 28, 2014.

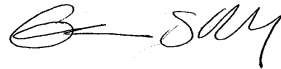
6. Attached hereto as Exhibit 4 is a true and correct copy of the letter I sent via email to Assistant U.S. Attorney Natalie Kuehler, dated March 6, 2014.

7. Attached hereto as Exhibit 5 is a true and correct copy of the letter I received via email from Assistant U.S. Attorney Natalie Kuehler, dated March 13, 2014.

8. On March 5, 2013, I received a telephone voice mail message from Assistant U.S. Natalie Kuehler, stating that despite earlier representations that ICE had tasked the request, in fact ICE had not done so.

DATED: March 14, 2014

New York, New York



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By: Ghita Schwarz  
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