

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DETENTION WATCH NETWORK, CENTER FOR  
CONSTITUTIONAL RIGHTS,

*Plaintiffs,*

v.

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

*Defendants.*

DOCKET NO.: 14-CV-583 (LGS)

**Document Electronically Filed**

**DECLARATION OF GHITA SCHWARZ IN FURTHER SUPPORT OF  
PLAINTIFFS’ MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Ghita Schwarz, hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge:

1. I am an attorney at the Center for Constitutional Rights (“CCR”), counsel for Plaintiffs in this litigation. I am admitted to practice in this Court. I make this Declaration in Support of Plaintiffs’ Sur-reply in Support of their Motion for Partial Summary Judgment. For ease of reference, Exhibit Numbers are continued from Plaintiffs’ prior submissions in support of this motion.

2. Attached hereto as Exhibit 16 is an email chain including a news article published in the Houston Chronicle newspaper, Bates-numbered 23181-85, produced to Plaintiffs on January 15, 2016 by Defendant agency U.S. Immigration and Customs Enforcement (“ICE”).

3. Attached hereto as Exhibit 17 is a staffing plan for the Adelanto Detention Center, Bates-numbered 3853-54, produced to Plaintiffs on October 15, 2014 by Defendant agency U.S. Immigration and Customs Enforcement (“ICE”).

Date: March 4, 2016

New York, New York

Respectfully submitted,



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