

EXHIBIT 89.2

EXHIBIT 36

DECLARATION OF IRMA VERONICA LIMA GALICIA

I, Irma Veronica Lima Galicia, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Irma Veronica Lima Galicia. I am a national of Guatemala. I am 35 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was travelling with my fifteen year old and nine year old daughters when we turned ourselves into Customs and Border Patrol agents at the port of entry in Nogales on March 2, 2015 around 2pm.
4. After asking us questions, we were escorted about ten minutes walking to arrive at a holding cell. We were detained in that cell for 10 hours. The cell was about four meters by four meters. There were no other people in our cell.
5. The only furniture were two metal benches and four hard plastic crate-like objects for us to lay down on. But the crates were not comfortable to lay down in.
6. There were no bathrooms within the cell so we had to ask permission to go down the hall to the bathrooms.
7. We were offered food several times while detained in the cell. The food consisted of instant soup, Cheetos, crackers, and juice. There was also a water container in the holding cell.
8. When we were detained we had not eaten for a whole day. We were very hungry but we were initially too traumatized by our situation to eat.
9. We were not given a formal medical exam. One agent asked if we were sick and we said that we were not.
10. I signed several documents that I did not understand, because some of them were in English.
11. When I was interviewed by a CBP agent he asked why I did not want to go back to my country. I said I was afraid and he asked what I was afraid of. He said that I had to give him a specific response and that it was no joke. I was so nervous because of his aggressive questioning that I did not know what to say.
12. After spending 10 hours in the CBP holding cells, we were transported to the Tucson Border Patrol station.

13. Once at the Tucson Border Patrol station, we were placed in a cell that was about 5 meters by 4 meters large. There were three other mothers and three other children in the cell.
14. The only furniture in the cell consisted of concrete benches that ran along the sides of the room. There was not space to sit down or move around in the cell because the floor was covered by other people laying down.
15. We were kept in this cell for 16 hours. We spent 1 night in this cell. There were no beds when we arrived in the cell. After a time, they brought us two inch thick pads to sleep on.
16. The temperature in the cell was cold. The Border Patrol agents took away my sweater and my fifteen year old daughter's sweater from me before putting me in the cell, so we were only wearing short sleeve shirts.
17. We were only given thin aluminum sheets to stay warm. The blankets only helped a little bit and we still were cold.
18. We were only able to sleep about 3 hours that night because of the cold and because we were hungry.
19. There were two toilets in the cell. The toilets were partially screened from view and the agents could see us as we went to the bathroom. One of the two toilets was dirty and covered by a plastic bag. It smelled bad.
20. There were two sinks in the cell but we could not use one sink because we would have had to stand over the smelly toilet. There was also no soap or paper or cloth towels so we could not wash our hands while after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
21. There were no waste bins in the cell and there was garbage on the floor. The cell was dirty and the smell was awful.
22. There was a water container in the cell and but no cups for drinking water. I asked for a cup and the agent said that they would not give out cups and I would have to squat down to drink the water as it fell out. But eventually he did go and bring five or six cups for us.
23. We were given something to eat three times. The food consisted of crackers, juice, and burritos. It was barely edible and we did not eat the burritos. We were very hungry. My nine year old daughter was crying from hunger.
24. We were never told that we could use the telephone.
25. We were never given a medical exam at the Tucson station, nor were we asked about our health. My nine year old daughter and I both had terrible headaches. She was crying from the pain. I asked the agent for pills for our headaches but the agents said that they did not give out pills.

26. I felt terrible while I was detained, mostly because I had to watch my daughters suffer and cry due to the terrible conditions.

27. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4 day of March, 2015 in Tucson, Arizona.

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CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, *Irma Lima Galvez*, in Spanish.
3. *Irma Lima Galvez* affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4 day of March in Tucson, Arizona.



EXHIBIT 37

DECLARATION OF YURI ROLANDA PEREZ LOPEZ

I, Yuri Rolanda Perez Lopez, hereby declare:

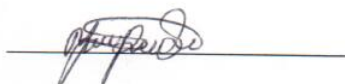
I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Yuri Rolanda Perez Lopez. I am a national of Guatemala. I am 22 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was crossing the fence near Douglas, Arizona and being lowered to the other side when the cords broke and I fell to the ground and fractured my ankle. About fifteen minutes after I fell, I was detained by U. S. Border Patrol agents on March 4, 2015 around 8pm.
4. When Border Patrol agents detained me, the agent asked what had happened and upon seeing my injury called an ambulance to take me directly to a medical facility to receive care my broken ankle. I am not sure what kind of medical facility it was and whether it was a hospital.
5. The doctor who saw me said that my ankle was simply dislocated. He pulled on my foot to put it back into place. He then put a splint and a cloth bandage on my ankle. He told me to walk on crutches.
6. I was also given an ultrasound to check on my pregnancy. The nurses told me that I was seven months pregnant.
7. I was not given any food nor water while I was in the hospital. I was very hungry because I had not eaten since the early the previous day.
8. I was in the medical facility approximately 14 hours. I was then transported to the Douglas Border Patrol station.
9. Once at the Douglas Border Patrol station, I was placed in a cell that was about 8 feet by 10 feet large. There were 5 other women in the cell.
10. The only furniture in the cell consisted of one concrete bench that ran along one side of the room. In order for all of us to fit, we all had to squeeze together on the bench.
11. I was kept in this cell for 7 hours.
12. The temperature in the cell was very cold. The Border Patrol agents took my sweater from me before putting me in the cell, so all I was wearing was a sleeveless shirt. Because of the cold, the pain in my leg was extreme.

13. We were only given thin aluminum sheets to stay warm. I tried to wrap up in the sheet in order to stay warm, but I was not able to get warm. I was shivering and I could not get warm.
14. I couldn't sleep in the hospital because of the pain, and I wanted to sleep during the day in Douglas, but I couldn't because of the cold. There were also no beds in the cell and we were not provided any blankets or other bedding so there was no way for me to lay down, given that my ankle is broken.
15. We were only given snacks two times in my time in Douglas. We were first given only crackers and juice, then we were only given a burrito and a juice. I was not given anything to eat in the hospital, so this was not enough food. I was very hungry.
16. We were not given any water to drink, and we were dehydrated.
17. There were two toilets in the cell. The toilet was only partially screened from view. We were embarrassed to go to the bathroom because the Border Patrol agents could see us.
18. There were two sinks in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean ourselves after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
19. I was dehydrated, hungry, and in extreme pain. I was very miserable.
20. When I entered the Douglas station, I asked for a phone call. I was told that we could not make a phone call, and that we were all just going to be deported. Other people ask for phone calls too. They were told that the consulate is not the person in charge, the guards were the people in charge and they were going to be deported.
21. I was released from the medical facility with prescription medication for the pain. But Border Patrol agents took those pills from me. While I was in detention, I yelled from the pain and begged for the pills. But the agents refused to give them to me. Only once in my entire time in detention was I allowed to take my prescription.
22. When I was screaming in pain, I was told not to cry because I was just going to be deported to Guatemala and there was nothing I could do.
23. After spending 7 hours in this cell, I then was moved to another Border Patrol station. The second station was located at Tucson. I spent a total of 24 hours in a cell in the second Border Patrol station, and one night.
24. The cell was approximately the same size as the cell in Douglas, and there were six other people in the cell with me.
25. There were no beds nor bedding in the cell. It was impossible to sleep in Tucson because I could not lay down, it was cold, and I was in pain.

26. The cell in Tucson was just as cold as in Douglas, and they only gave us an aluminum sheet to keep warm. It was not sufficient to keep warm.
27. The whole time I was in Tucson we were only given snacks twice. These snacks were crackers and juice. It was not sufficient for me and I was extremely hungry.
28. There was a water cooler in the cell, but there was only one cup and we all had to share. The water was very foul, and I was the only one of us who drank. I was so dehydrated I had to drink the water, but none of the others would drink the water.
29. When I asked for my medication in Tucson, the agent yelled at me to be quiet and that I would give my pills every four hours. But they never gave me any.
30. The bathroom facilities in Tucson were similar to those in Douglas.
31. While I was detained I felt like I was going to die because the pain was so bad. I could not breathe.
32. Four days after being released from detention, I was still in extreme pain. A volunteer from the community in Tucson took me to a medical clinic and the doctor who evaluated me there told me to immediately go to the hospital.
33. I was given an ultrasound at the University Medical Center and the nurses told me that I was eight months pregnant, which is much further along than the medical facility in Douglas had said.
34. The following morning, Wednesday, March 11th, an orthopedic surgeon at the University Medical Center operated on my ankle. He said that it was a complex fracture and I should not have put any pressure on my injury at all. That information was different than what I was told in Douglas.
35. I spent three days in the hospital recovering from my surgery and had to wait in Tucson for two months before I could walk well enough to travel.
36. In my time since being released, I have avoided going out because I am afraid of being detained again. I was particularly scared when I had to go to my check-in with ICE officials after a month, because the check-in location was very close to the Tucson Border Patrol station and it made me remember the terrible experience I had there.
37. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6 day of May, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Yuri Rolanda Perez Lopez, in Spanish.
3. Yuri Rolanda Perez Lopez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6 day of May in Tucson, Arizona.



EXHIBIT 38

DECLARATION OF SEQUEN-TESEN REYES OVIDIO

I, Sequen-Tesen Reyes Ovidio, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Sequen-Tesen Reyes Ovidio. I am a national of Guatemala. I am 27 years of age.
2. I speak and read Spanish. I speak a little English.
3. I was picked up by U. S. Border Patrol agents at/around Naco near Sonora. It was very close to the border. The land around there is desert. On about June 27th around 11 p.m. at night. It was a Friday. I know they arrested me on this day because I had a cell phone. The immigration officers that got us were on horseback. I was walking. They roughed me up when they arrested me. They shoved me to the ground and I fell into some branches. They shouted at me.
4. I was transported to the Naco Border Patrol station. The trip lasted about 5 minutes from where they arrested us to the station. I was driven there in a Border Patrol van with just one other person. I didn't have family with me. My wife and U.S. born children live in the United States.
5. Once at the Naco Border Patrol station, I was placed in a cell that was about 20 feet by 15 feet large. There were about 30 people in that cell. It was crowded. I was there for about 7-8 hours. Then they brought people out one by one for fingerprints. Then they had us wait in a different room. In the new room, there were fewer people. I stayed there for several hours.
6. It was really cold in the Naco cell. ~~They gave us aluminum sheets.~~
7. The only furniture in the cell consisted of concrete benches that ran along the sides of the room. There were 2 of these benches in the cell. This was enough space for approximately 30 people to sit down, but some people were sleeping on the benches, taking up room. There were not enough benches for everyone in the cell to sit on them at the same time. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor. In the second cell I was in, there was more room because there were fewer people. There were other cells that had women and children.
8. I saw a sign on the wall of the cell saying how many people were allowed to be in the cell. While I was there, the Border Patrol agents put more than this number of people in my cell. I knew this because I can read Spanish and a little English. The sign on one of the walls said about 18 people could fit, but there were about 30 people in that room.

9. It was impossible to sleep in Naco. There ~~were~~ was a fair amount of commotion. The light was kept on all night which also made it very hard to sleep. I was kept a total of 1 night in this cell.
10. The temperature in the cell was very cold. The Border Patrol agents took my tank top from me but let me keep my t shirt. I was not able to get warm, though they did give us blankets. The guards would not change the temperature. One person asked them to warm up the room. But they did not. Not all of us got a blanket, some people had aluminum blankets.
11. There was one toilet in the cell. The toilet was open to view. The toilet was dirty.
12. There was one sink in the cell but no soap or paper or cloth towels. We dried our hands on our clothes. There also were no toothbrushes, toothpaste, or shower facilities.
13. There was one officer who spoke Spanish. I told him I needed to speak with my wife. They let me talk to my wife. They told me they were making an exception for me and they told me not to tell the others.
14. When I got there, I was hurting from when they shoved me to the ground. My arm was swollen. I asked for a bandage to wrap around my arm or a painkiller and they provided neither.
15. I was never permitted to go outside or even to leave my cell. ~~I was not handcuffed while in Naco.~~
16. On Saturday afternoon, they moved us to a different facility, I think it was Tucson. I was in Naco for a night and one morning and one afternoon.
17. The cell in the Tucson facility was a little bigger. I think there were about 90 people in there. It was only men in there. There were more benches in this one. I think there may have been as many as 8 cement benches there. They were all along the walls and in the middle of the cell. I'd say about 40 people could fit on the benches. Not nearly enough room for everyone. People were sleeping on the floors. I didn't see a maximum capacity sign. I slept on the floor. There were no beds.
18. We arrived at the Tucson facility at around 6pm on Saturday and left around 5 am on Monday. So I was in the Tucson facility for 2 nights sleeping on the floor.
19. It was very cold in the Tucson facility. Especially on the floor. We did not receive blankets – just those aluminum blankets. A lot of people were shivering. I had my hands in my t-shirt to keep warm.
20. There were 4 toilets but one was out of service. So three were working.
21. There were sinks in each toilet but no soap and no towels. There were no showers. They didn't give us toothbrushes or toothpaste. From when I was arrested on Friday/Saturday until Monday, I couldn't take a shower or brush my teeth or use soap.

22. They gave us about 4 of those little burritos to eat. Sometimes they gave us juice and cookies too. It wasn't enough food. I was hungry.
23. I wasn't allowed to go outside when I was at the Tucson facility.
24. I didn't sign anything when they arrested me. The only thing I remember signing was documents about deportation when I got to Tucson. I said I wanted to ask for asylum. I indicated that on the form they gave me. I'm scared to go back to Guatemala. The MS13 has killed members of my family, including my father.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 10 day of July 2014 in Florence, Arizona.



Sequen-Tesen Reyes Ovidio

CERTIFICATE OF TRANSLATION

1. My name is Alejandro D. Harrietas Rojas and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Sequen-Teson Reyes Ovidio, in Spanish.
3. Sequen-Teson Reyes Ovidio affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 10 day of July 2014 in Florence, Arizona.



EXHIBIT 39

DECLARATION OF ADRIANA TRUJILLO HERNANDEZ

I, Adriana Trujillo Hernandez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Adriana Trujillo Hernandez. I am a national of Mexico. I am 29 years of age. I have two children, ages 4 and 9, who are U.S. Citizens.
2. I speak Spanish and can read some. I speak and read English only a little bit.
3. I was picked up by U. S. Border Patrol agents in the desert near Douglas, Arizona on December 2nd. They took me to the Douglas Border Patrol station, where they held me for one day, and one night.
4. I was sick when I arrived. My head hurt and I did not feel well. I asked to see a doctor, and they told me they would call one, but the doctor never came. I asked if they could give me something for my headache, and they told me there was nothing they could do.
5. Once at the Border Patrol station, I was placed in a cell that was about 15 feet by 20 feet. There were 7 other women in the cell. There were only concrete benches to sleep on, and not enough space for all of us. Some of us had to sleep on the floor. It was very, very cold. I don't know why they make it so cold. I had a jacket I could have used to keep warm, but they took it from me. They only gave us aluminum blankets to stay warm. It didn't really help. I was on a bench, but I could not sleep because it was so cold and I felt sick. I did not sleep at all that night.
6. There was one toilet, with no door. The toilet was next to the guard's office. It was not private at all. There was a sink to wash our hands, but no soap. There was nowhere to bathe, or brush our teeth. There was trash all over the floor because there was nowhere else to put it.
7. Most of the people in the cell were detained while crossing the desert. Most of them were physically and emotionally exhausted. Many were already sick, even before they were placed in the dirty, frigid cells. Almost everyone was very dirty and was not allowed to bathe or even wash their hands properly.
8. There was no water to drink. Twice they gave us a small burrito, a small package of crackers, and a small juice. The juice was all I had to drink all day. The food was not enough for the day.

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9. They told us that we could not call anyone.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

Adriana Trujillo

CERTIFICATE OF TRANSLATION

1. My name is SAMUEL YALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, ADRIANA TRUJILLO HERNANDEZ, in Spanish.
3. ADRIANA TRUJILLO HERNANDEZ affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.



A handwritten signature in black ink, consisting of a stylized 'S' followed by a checkmark-like flourish, is written over a horizontal line.

EXHIBIT 40

DECLARATION OF LUIS CARLOS VALLADARES MARTINEZ

I, Luis Carlos Valladares Martinez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Luis Carlos Valladares Martinez. I am a national of Mexico. I am 37 years of age.
2. I speak and read Spanish. I speak only a little bit of English.
3. I was picked up by U. S. Border Patrol agents in Agua Prieta on June 27, 2014.
4. I was transported to the Douglas Border Patrol station. The trip lasted about 20 minutes. I was driven there in a Border Patrol van. I was the only one in the van.
5. Once at the Douglas Border Patrol station, I was placed in a cell that was about 75 paces all around, I know because I kept pacing around it all the time. There were about 20 other people in the cell when I got there. By the time I left, there were about 35 people in that cell. The others were only men.
6. The cell had concrete benches that ran along the sides of the room and also down the center of the room. There were about 6 of these benches in the cell. This was enough space for approximately 25 people to sit down. By the time I left, there were not enough benches for everyone in the cell to sit on them at the same time. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor. By the time I left, the cell was so crowded it was hard to even walk, and it was hard even to get up to walk to the bathroom.
7. I saw a sign on the wall of the cell saying that only 31 people were allowed to be in the cell. While I was there, the Border Patrol agents put more than this number of people in my cell. I knew this because the agents would come in and count us, I stopped counting at 35. I stopped counting after that.
8. I was kept in this cell for about two days. I spent two night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete floor. I hardly slept because it was so cold and uncomfortable. The light was kept on all night which also made it very hard to sleep. I was kept a total of two nights in this cell.
9. The temperature in the cell was very cold. I was only wearing a short sleeve shirt. I was not able to get warm. They only gave us an aluminum sheet to keep warm. Mine ripped the first night and I asked for another one. They gave me another one. The second night I asked for another one because I was cold and they didn't give me one. We asked the guards to change the temperature. The guards would not change the temperature, they told us to stop talking. All they gave us to stay warm were aluminum sheets that did not keep us warm.

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or 15 ft.
by 20 ft.

10. There were three toilets in the cell, but one didn't work. The toilets were only partially screened from view. There was enough toilet paper for everyone. When we ran out of toilet paper, the guards did bring us more. The two toilets that worked were very loud, it sounded as if they were going to stop working.
11. There were three sinks in the cell but no soap or paper or cloth towels. There also were no toothbrushes, toothpaste, or shower facilities.
12. There was a water container in the cell and no cups. We would use our used juice boxes as cups to drink water.
13. We were given something to eat three times a day. The food consisted of a small pack of cookies (6 little cookies) and a burrito for breakfast, lunch, and dinner. It was barely edible, but I had to eat. I was still hungry and was hungry between meals.
14. Just before being transferred, I asked to use the phone to call my wife to tell her when I was and was told that I could not make any phone calls other than to call the Mexican consulate.
15. During my time in detention, I would have liked medical treatment for a large, deep gash I got on my chest when trying to cross the border. But when I showed it to an agent he said it was nothing. I didn't bring it up again because they don't listen, they get mad just by us talking.
16. I was kept in this cell for two days. There were other men there who had been in there a couple days longer, I was afraid they would keep me in there long.
17. I was never permitted to go outside or even to leave my cell. I was not handcuffed while in detention.
18. I was moved to another Border Patrol station in Tucson after spending two days in the first station. I spent a total of eight hours or so in a cell in the second Border Patrol station. The condition of the cell in the second station was like the first, except they gave us less food, we got juice and cookies only.
19. I spent half a night in the second cell. Like the first, there were no beds or bedding and I had to lie on the floor to get any sleep at all.

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20. This situation and being detained under these conditions, being treated like a criminal has been very tough on me.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 11 day of July 2014 in Florence, Arizona.



Luis Carlos Valladares Martinez

CERTIFICATE OF TRANSLATION

1. My name is NORA PRECIADO, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, LUIS CARLOS VALLADARES MARTINEZ, in Spanish.
3. LUIS CARLOS VALLADARES MARTINEZ affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 11 day of July 2014 in Florence, Arizona.



EXHIBIT 41

DECLARATION OF ADRIAN VASQUEZ MORALES

I, Adrian Vasquez Morales, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Adrian Vasquez Morales. I am a national of Guatemala. I am 51 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I and my six year old son were detained up by U. S. Border Patrol agents around Douglas, Arizona about 9pm on February 24, 2015.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 15 minutes. We were driven there in a Border Patrol van. There were about 9 other people in the van with us.
5. Once at the Douglas Border Patrol station, we were placed in a cell that was about three meters by four meters large. There were no other people in the cell.
6. The only furniture in the cell was one concrete bench along one side of the cell.
7. We were kept in this cell for 16 hours. We spent one night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. My son and I had to sleep on the floor.
8. The temperature in the cell was very cold. The Border Patrol agents took my sweater from me before putting me in the cell, so all I was wearing was a short sleeve.
9. We were only given a thin aluminum sheet. The sheet did not help us keep warm. I asked the agents to turn off the cold air and one agent responded that we were detained so it was not supposed to be comfortable. Due to the temperature in the cell, we were not able to sleep.
10. It was also difficult to sleep because the light was on and we could hear the guards making noise.
11. There was one toilet in the cell. The toilet was only partially screened from view.
12. There was sink in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
13. There were no waste bins in the cell and there was garbage on the floor. No one came to clean the cell.

14. When we were detained we were already hungry and tired.
15. There was a water fountain in the cell but no cups for drinking water. We were not able to drink the water because we did not understand how the water came out of the fountain.
16. We were given something to eat twice in our time in Douglas. The food consisted of crackers and juices and burritos. It was barely edible and we were very hungry.
17. We were never allowed to make a phone call. I asked to use the phone to call my family and they said that I could not.
18. We were never given a medical exam. When we arrived one agent asked how we felt. My legs were bruised and scratched and I showed my wounds to the Border Patrol agents but they said "what do you think we can do about it?" My son's feet started to hurt from the cold and he was crying from the pain but the agents did not respond.
19. One of the agents told me that they were going to take away my son. They said that my child would stay in the US and they would deport me. I said that I did not want to be separated from him. The agents responded that the US didn't want any more Guatemalans.
20. I signed various documents that I did not understand. I asked the agents to explain the papers but they just said "sign." I responded that I did not want to sign because I didn't know if I was signing to be deported and they said that I did not have the right to know whether or not they were my deportation papers because I just had to sign.
21. After spending 16 hours in this cell, we were transferred to the Tucson Border Patrol station.
22. We spent a total of 2 hours in the Tucson Border Patrol station. The conditions were similar in the Douglas Border Patrol station.
23. While I was detained I was very sad and afraid that the agents would take away my son. I cried because of my situation. My son was also crying.
24. I am afraid of returning to my country. In 2009, my brother was kidnapped, tortured and killed in Guatemala. I tried to participate in the investigation of my brother's murder and I started to receive threats.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of February, 2015 in Tucson, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Josuan Fofie, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Adrian Vasquez Morales, in Spanish.
3. Adrian Vasquez Morales affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of February 2015 in Tucson, Arizona.



EXHIBIT 42

DECLARATION OF JUDITH SOLEDAD MORALES PEREZ

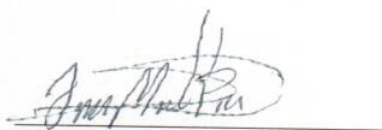
I, Judith Soledad Morales Perez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Judith Soledad Morales Perez. I am a national of Guatemala. I am twenty-three-years-old.
2. I fled my country and I am afraid to return.
3. I am currently detained by U.S. Immigration and Customs Enforcement in Eloy, Arizona.
4. I speak Spanish. I do not speak or read English.
5. I was arrested by U. S. Border Patrol agents in the desert near Douglas, Arizona on or around the evening of February 28, 2015.
6. I was driven to the Douglas Border Patrol station in a Border Patrol vehicle. The trip lasted about thirty minutes.
7. I was detained in Douglas for about two days before I was transferred to another facility in Tucson where I was detained for another day. I spent a total of three nights in Border Patrol custody.
8. After I arrived at the Douglas facility, agents told me to sign a paper agreeing to deportation. I told them that I was seeking asylum but they told me I had no right to stay in this country. One agent said, "We don't want people from other countries coming to take advantage of the United States." I did not sign that form, but eventually signed some other documents that I did not understand and that no one explained to me.
9. I am currently five months pregnant. When I arrived at the Border Patrol station, I told the agents I was pregnant, but the agents were very hostile and did not believe me. They insulted me and poked my stomach and said there wasn't anything there. They did not give me any kind of medical screening.
10. I was detained in a concrete cell that was about four meters by four meters. There were two or three concrete benches but no beds or other furniture.
11. The bathroom area had one toilet and a sink. There were no soap or towels, and there were no waste baskets so there was trash on the floor. The only drinking water came from the sink, but there were no drinking cups.
12. I had a headache and was very hungry, but the food was inedible and I noticed that the juice cups and crackers Border Patrol provided had expiration dates from December 2014.

13. The cell was very cold and I had no way to stay warm. Border Patrol took away my outer layers of clothing and gave me a thin aluminum sheet, so I had nothing to protect myself from the cold.
14. Someone asked a Border Patrol agent to adjust the climate but the agent refused.
15. As a result of the cold and the bright lights that were always left on, I was unable to sleep.
16. Before I was transferred, I was taken to an outside health clinic, but I was not examined for any health problems. They just wanted to confirm that I was pregnant, and I was quickly returned to the Douglas Border Patrol Station.
17. I never asked for a phone call because after seeing the way the agents treated me and the other women, I assumed they would refuse.
18. After about two days in Douglas I was transferred to the Border Patrol station in Tucson. The conditions there were almost identical to those in Douglas.
19. In Tucson, I was placed in a small, frigid, concrete cell. There were about ten other women in the cell, and with only a few concrete benches I had to try to sleep on the floor.
20. I still had only one layer of clothing and was given only a thin aluminum sheet. Because of the cold and the bright lights, I could not sleep.
21. We were occasionally given the same snack food—crackers and juice—but I was still very hungry. In the three days I was detained in Border Patrol custody I ate very little food.
22. As in Douglas, in the Tucson facility there was no soap and no towels. I was not given the chance to bathe or brush my teeth at any time while I was in Border Patrol custody.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March 2015 in Eloy, Arizona.



A handwritten signature in black ink, appearing to read "Amy Martinez", is written over a horizontal line.

CERTIFICATE OF TRANSLATION

1. My name is James Lyall, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Judith Soledad Morales Perez, in Spanish.
3. Judith Soledad Morales Perez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this ^{20th} day of March 2015 in Eloy, Arizona.

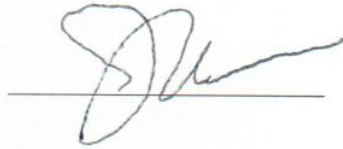
A handwritten signature in black ink, appearing to be 'JL', is written over a horizontal line. The signature is stylized and cursive.

EXHIBIT 43

DECLARATION OF JESUS ALFREDO MESA BARBOSA

I, Jesus Alfredo Mesa Barbosa, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Jesus Alfredo Mesa Barbosa. I am a national of Mexico. I am 27 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents around Nogales on or around December 6, 2014.
4. I was transported to the Nogales Border Patrol station. The trip lasted about 5 minutes. I was driven there in a Border Patrol van. There were only two of us in the car.
5. Once at the Nogales Border Patrol station, I was placed in a cell that was about 32 feet by 20 feet in size. I was the only person in the cell for two hours.
6. They then moved me to a second cell that was the same size. There were four of us in the cell. They continued to add people to the cell until there were about sixteen of us in the cell.
7. I was in the Nogales Border Patrol station for one night before I was moved to another facility.
8. The only furniture in the second cell consisted of concrete benches that ran along the sides of the room.
9. I was kept in this cell for 16 hours, and I spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete benches.
10. I could only sleep one hour because it was too cold. Three of the sixteen got small aluminum blankets but the rest of us did not. The three who had blankets were there before I arrived. We asked for blankets but they ignored us.
11. The temperature in the cell was very cold. The Border Patrol agents took my shirt from me before putting me in the cell, so all I was wearing was a light sweater.
12. One person complained about the temperature but the Border Patrol agents said that they would not change the temperature.
13. The light was kept on all night which also made it very hard to sleep. The aluminum sheets that the three people had made a lot of noise so it was also difficult to sleep.

14. There were three toilets in the cell. There was no toilet paper.
15. The cell got very dirty because there was nowhere to throw trash away. Those who had been there before had thrown their food wrappers on the floor so we had to clean them up. They only came to clean the cell once a day so we decided to clean the cell an additional two times a day but we didn't have any way to get rid of the trash so we put it in a pile in the corner until they came to throw it away.
16. There was one sink in the cell but it did not work. There was also no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush and soap with me but they were taken away from me.
17. The stressful environment gave me a headache that would not go away.
18. There was a no drinking water in the cell. I was not able to drink water for the duration of my stay there.
19. When I arrived they said they had already fed the rest of the detainees so I was not given food. They did not even give me food the next day before transferring me.
20. I asked for a phone call to the consulate and they said that I could not make the call. I said that it was my right to talk to the consulate and they said that we didn't have rights there and would have to wait until the consulate visited.
21. They threatened us that if we made too much noise they would take away the covers and the food. However, they never gave us food while I was there in any case, and only three people had covers.
22. After 16 hours in this cell, I was moved to the Tucson Border Patrol station. I spent a total of three days in that station.
23. Upon arriving in Tucson, I was very tired and hungry and thirsty. I was very sad because of the circumstances.
24. I was in the first cell for two hours. It was significantly smaller than the Nogales Station holding cell. It was 20 feet by 10 feet. There were forty of us in the cell.
25. There were concrete benches along the walls of the cell. Only about twenty of us could fit on the benches so the rest sat on the floor.
26. It was just as cold as the Nogales Station cell.
27. Just like the Nogales Station cell, there were no shower facilities nor was there soap at the sinks.
28. There was no water in the cell and they did not give us any food.

29. They changed me to another cell and there I was kept for twelve hours.
30. In the second cell at the Tucson Station there were about sixteen of us in a slightly larger area. The second cell also only had concrete benches along the side.
31. I tried to sleep in the second cell but it was too cold and they did not give us blankets or anything to keep warm. We asked for a blanket but they said we wouldn't be there for long so they did not give us anything.
32. They also did not give me food in this second cell nor was there any water container. At that point I had not eaten for almost two days.
33. Then they changed me to a third cell where I stayed for two and a half days. There were forty of us in that cell. The cell was 20 feet by 10 feet.
34. There were concrete benches along the side. Only about twenty of the forty of us could sit on the benches. The rest of us sat on the ground.
35. The cell was just as cold as the other ones. They only gave us aluminum blankets, which did not help us keep very warm.
36. They said that if we made too much noise they would take our food and blankets away. They said that if even one person made loud noise they would punish us all. So we tried to stay as quiet as possible because we were worried that our food would be taken away.
37. Over the course of two and a half days I could only sleep about four hours. I could not sleep because the cell was too crowded and the aluminum blankets made too much noise.
38. They gave us juice and crackers in the morning and then burritos and crackers every four hours. It was the first time I had eaten since being detained.
39. They had a water cooler but there were no cups with the cooler. We had to use our juice boxes to fill up with water.
40. There were three toilets but there were so many of us that they got dirty quickly.
41. They had sinks but no soap. There were also no shower facilities and no way to get clean.
42. There was no trash can. They only came once a day to clean so we cleaned as much as we could. The cell smelled very bad.
43. I asked to make a call to the consulate in Tucson. We realized that there was only one agent who would allow us to make a call to the consulate so we would wait until he was on duty to ask him because otherwise we would not be permitted a phone call. For this reason I could not make a call until my second day in this third cell.
44. I had lived in Arizona for twelve years and I have two US citizen children. I have not seen them for ten months because of a previous deportation.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

Jesus Barbosa

CERTIFICATE OF TRANSLATION

1. My name is JAMES LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Jesus Alfredo Mesa Barbosa, in Spanish.
3. Jesus Alfredo Mesa Barbosa affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

A handwritten signature in black ink, appearing to read "James Lyall", is written over a horizontal line.

EXHIBIT 44

DECLARATION OF REGINALDA LOPEZ GOMEZ

I, Reginalda Lopez Gomez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Reginalda Lopez Gomez. I am a national of Guatemala. I am 29 years of age.
2. I speak but do not read Spanish. I do not speak or read English.
3. My two year old daughter and I were picked up by U. S. Border Patrol agents about December 17th, 2014 after around 15 hours of walking after crossing the border at Douglas, Arizona.
4. We were transported to the Douglas Border Patrol station. The trip lasted about 20 minutes. We were driven there in a Border Patrol car. There were about two other women with three children in the car with us.
5. Once at the Douglas Border Patrol station, my daughter and I were placed in a cell that was about 15 feet by 10 feet large. There were no other people in the cell.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room.
7. We were kept in this cell for 20 hours. We spent 1 night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete floor.
8. The temperature in the cell was very cold. All they gave us to stay warm were aluminum sheets that did not keep us warm. We covered ourselves with the blanket to warm up, but we were not able to get warm. My daughter cried because she was so cold. Due to the temperature in the cell and discomfort on the hard cell floor, I was only able to sleep for 3 hours each night. My daughter was also barely able to sleep.
9. The light was kept on all night which also made it very hard to sleep.
10. There was one toilet in the cell. There was one sink in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me and they did not let me take it out.
11. There were no waste bins in the cell and we had to throw our garbage on the floor. They only cleaned the cell once in the time we were there.

12. When we were detained, we were very cold from the walk in the desert. I felt sick and had a headache and pain in my ear. My daughter was hungry and tired when we were detained.
13. The guards never asked me about how I felt nor gave me the option of receiving medical care. They also did not check my daughter for medical issues.
14. We were not given water for 12 hours until I asked the day after I was detained and they finally gave us a jug of water.
15. They only gave us food twice in the 20 hours that we were there. The food was only a juice, crackers and burritos. Neither of us liked the food so we only drank the juice. Even if we had eaten it, it would have been too little food to keep me from being hungry before the next meal. When we were detained, we had already not eaten for 15 hours.
16. I asked to make a call to my family member but they did not let us use the telephone.
17. After spending 20 hours in the Douglas Border Patrol station, we were moved to the Tucson Border Patrol station.
18. In the Tucson Border Patrol station, we were put in a cell that was approximately 15 feet by 10 feet. There were six other families in the cell for a total of 20 people.
19. The only furniture in the cell were hard concrete benches along the sides of the cell. We only were able to fit on the benches if the children sat on their mother's laps. At times some women and children had to sit on the ground.
20. The cell was also very cold in Tucson. We were only given an aluminum blanket to keep warm.
21. All of the children in the cell were crying, some because of the cold and others because they were so hungry.
22. We were in the Tucson Border Patrol Station for 20 hours and spent one night there. There were no beds nor bedding. My daughter and I had to sleep on the floor and other families also slept on the floor. We only slept about three hours.
23. It was also difficult to sleep because the light was on for the whole night. The cell was also very loud because all of the kids were crying constantly.
24. They gave us food twice a day. The food only consisted of crackers, juice and burritos but none of us liked the food. My daughter had not eaten for three days at that point because she did not like the food and she cried constantly from hunger.
25. There were two bathrooms in the room and they were only partially covered. There was toilet paper but it ran out quickly because there were so many of us. It took them two hours to bring more toilet paper when it ran out.

26. There were two sinks but no soap nor towels so it was impossible to wash our hands well after going to the bathroom. There were also no facilities for bathing or showering. We all smelled bad because we had not taken a shower for days.
27. There was no trash can in the cell so we had to throw our trash on the floor. It smelled very bad in the cell. They only came twice to clean.
28. I asked to make a call to my family member but they did not allow me to call. Another women was insisently asking for a phone call but they did not let her call either.
29. I felt even sicker in the Tucson Border Patrol station but I was not given medical attention and I was afraid to ask because the guards seemed very angry.
30. I was crying in detention because I did not know what to do and the conditions were so difficult.
31. My daughter also felt terrible in the conditions and cried constantly.
32. I am afraid of returning to my country.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19 day of December 2014 in Tucson, Arizona.

+

CERTIFICATE OF TRANSLATION

1. My name is ^{Joanna}~~Frank~~, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, ^{Rosinalda}~~Copez Gomez~~, in Spanish.
3. ^{Rosinalda}~~Copez~~ ^{Gomez affirmed that the contents of the declaration were true and correct to the best of his knowledge.}

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19 day of December 2014 in Tucson, Arizona.



EXHIBIT 45

DECLARATION OF JUAN REYES MARTINEZ

I, Juan Reyes Martinez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Juan Reyes Martinez. I am a national of Mexico. I am 34 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents on December 6, 2014 about a day and a half walking after crossing near Sonoita, Arizona.
4. I was transported to the Casa Grande Border Patrol station in a Border Patrol van. The trip lasted about two hours. There were about eight other people in the vehicle with me.
5. Once at the Casa Grande Border Patrol station, I was placed in a cell that was about 5 by 5 meters large. There were six other people in the cell.
6. The only furniture in the cell consisted of concrete benches that ran along the sides of the room and also down the center of the room. There were about 4 of these benches in the cell.
7. I was kept in this cell for 9 hours.
8. The temperature in the cell was very cold. The Border Patrol agents took my jacket from me before putting me in the cell, so all I was wearing was a long sleeve shirt.
9. They only gave us aluminum blankets. The blankets only helped us stay warm a little bit. I curled up as best as I could to stay warm but I was not able to get warm. Due to the temperature in the cell, I was only able to sleep for two hours.
10. I spent one night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete bench.
11. The light was kept on all night which also made it very hard to sleep. The cell was loud because other people were talking.
12. There were two toilets in the cell. The toilet was only partially screened from view.
13. There was one sink in the cell but no soap or paper or cloth towels. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush, soap with me and it was taken away from me.
14. The cell was dirty because of all of the mud that people had tracked in. In the time that I was there the cell was never cleaned.

15. I was very tired when I was detained because I had been walking for a day and a half. I was also very hungry and thirsty.
16. There was a water container in the cell but no cups for drinking water. We had to use our old juice boxes to fill up with water.
17. We were given something to eat twice. The food consisted of crackers and juice. It was too little to keep me from being hungry before the next meal.
18. They gave us papers that were written in English and they did not explain what the papers said. They just said that we had to sign.
19. After 9 hours in the Casa Grande Border Patrol Station, they transferred us to the Tucson Border Patrol Station.
20. The cell that they put me in at the Tucson Station was 6 by 7 meters. There was a placard that said that the maximum capacity of the cell was 38 people, but there were fifty people in the cell.
21. The only furniture in the room was four concrete benches. There was only space for about twenty people to sit on those benches. Others had to sit or lay on the ground or stand.
22. I was in the Tucson Border Patrol Station for 72 hours.
23. The cell was very cold and they only gave us aluminum blankets.
24. I spent three nights in that cell. I could only sleep about ten hours in total because there was so much noise from the other people in the cell. There were no beds or bedding so we had to sleep on the benches and the floor. The light was also constantly on, which made it difficult to sleep.
25. There were four toilets. The toilets were only partially screened from view.
26. There was one sink in the cell but no soap or paper or cloth towels. Just like the Casa Grande station, it was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes, and no bathing or shower facilities.
27. There was a water container in the cell but no cups for drinking water. We had to use our old juice boxes to fill up with water.
28. We were given food three times a day. The food consisted of crackers and juice. They only gave us a burrito in the mornings. It was too little to keep me from being hungry before the next meal. By the time I left that cell, I had not had sufficient food for almost five days between my time crossing the desert and my time in detention.

J R M

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.



CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Juan Reyes Martinez, in Spanish.
3. Juan Reyes Martinez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.



EXHIBIT 46

DECLARATION OF GUSTAVO HUERTA SAENZ

I, Gustavo Huerta Saenz, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Gustavo Huerta Saenz. I am a national of Mexico. I am 36 years old.
2. I speak and read Spanish. I speak English, but can only read and understand about a third of what I read in English.
3. I was picked up by U.S. Border Patrol agents in Nogales at the train station on December 5th. I was transported to the Nogales Border Patrol station.
4. Once at the Nogales Border Patrol station, I was placed in a cell that was about 20 feet by 30 feet large. There were 10 other men in the cell.
5. I was kept in this cell for about 24 hours. I spent one night in this cell. There were no beds in the cell and we were not provided any blankets or other bedding. I had to try and sleep on the concrete bench.
6. The temperature in the cell was very cold. The Border Patrol agents took most of my clothing from me before putting me in the cell, so all I was wearing was a short sleeve shirt.
7. There didn't give us any blankets. The guards would not change the temperature. They told us that they did not control the temperature. All they gave us to stay warm were aluminum sheets that did not keep us warm. I had to be careful not to tear my aluminum sheet because the guards would not give us another one. I was not able to get warm, and could not sleep all night.
8. The light was kept on all night which also made it very hard to sleep. The guards were making noises all night, making it hard to sleep.
9. There was one toilet in the cell. The toilet was only partially screened from view.
10. There was one sinks in the cell but no soap or paper or cloth towels. I couldn't wash my hands or clean myself after using the toilet. We had no toothbrushes, and we couldn't bathe or shower.
11. There were no trash cans in the cell and there was garbage all over the floor. The cell was dirty, covered with juice boxes and cookie wrappers.
12. I had just crossed through the desert and I was very hungry and thirsty. I had food with me in my backpack, but the guards simply threw it away. Everyone in the cell was hungry and thirsty.

13. Most of the people in the cell were detained while crossing the desert. Most of them were physically and emotionally exhausted. Almost everyone was very dirty and we couldn't bathe or even wash our hands properly.
14. There was a water fountain, but no cups for drinking water. We had to use our tiny juice boxes to drink water out of.
15. We were given something to eat three times a day. Twice it was a very small bean burrito, small cookies, and a tiny box of juice. The midday meal was the same without the burrito. One time some of us received burritos in tortillas that had gone bad and were black all over. We did not eat the burritos because they had gone bad. The food I received was far too little to keep the hunger away.
16. After Nogales, they took me to the Tucson Border Patrol station. I stayed in Tucson for about another 24 hours. There were about 50 people in the cell, all sitting on a long bench. The cell was about the same size as in Nogales. There was no place to lie down and sleep. Some people had to sleep right next to the bathroom because there simply was no space. There were three toilets.
17. The food in Tucson was the same as in Nogales. It was always too little.
18. Again the cell was very cold, and they gave us only the aluminum sheet. I couldn't sleep.
19. In Tucson, the guards offered to call the consulate for us if we wanted, but they would not let us speak to them. The guards would be the only ones to talk to the consulate.
20. They gave me a document to sign and told me that it was to obtain voluntary departure. I signed the document. It was not until I got to court that my lawyer told me I had signed my deportation papers.
21. I am afraid to return to Mexico, especially without money. I am afraid that I will be kidnapped because people will think that I am an American who has money or family with money. I have previously lived in Nevada for nine years, and I have a nine-year-old son who is a U.S. citizen.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.

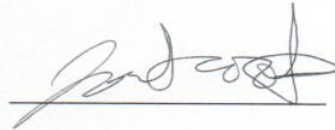


Gustavo Huerta Saenz

CERTIFICATE OF TRANSLATION

1. My name is Joanna Foote, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Gustavo Huerta Saenz, in Spanish.
3. Gustavo Huerta Saenz affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16 day of December 2014 in Florence, Arizona.



A handwritten signature in black ink, appearing to read 'Joanna Foote', is written over a horizontal line.

EXHIBIT 47

DECLARATION OF JESSICA MARGARITO CATARINO

I, Jessica Margarito Catarino, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Jessica Margarito Catarino. I am a national of Mexico. I am twenty-two years old. I am the mother of two U.S. citizen children.
2. I speak Spanish. I do not speak English.
3. I was arrested by Border Patrol on or around December 1, 2014. While we were still in the desert, Border Patrol gave me some papers and told me to sign; they did not explain the papers to me but I understood them to mean that I would be quickly returned to Mexico.
4. I was then put in a Border Patrol truck with fourteen other people and driven to the Tucson Border Patrol station. I was the only woman in the truck, which was extremely cold inside. The trip lasted almost two hours and we arrived in the evening.
5. Once at the Tucson Border Patrol station, I was placed in a small room with about ten other women. The cell was very small. Over time, more people arrived until there were twenty-two women in the cell.
6. There were a couple of concrete benches running along the wall. With so many women in the cell it was not possible for all of us to sit on the benches so several people had to sit on the floor. There were two bathrooms. The cell was filthy and extremely cold.
7. After a few hours, I was put in another Border Patrol truck with three women and four men. We were driven to the Casa Grande Border Patrol Station. The agent drove the car very recklessly, as if he were trying to throw us around; at one point he took a sudden turn and I fell over.
8. We arrived at the Casa Grande station late at night. I was handcuffed and processed. An agent went through my belongings and made me take off my extra layers of clothing so that I was only wearing a t-shirt and pants.
9. After about an hour, they put me in a cell with about fifteen other women. The cell was a little bigger than the one in Tucson. There were thin concrete benches but again there was not enough space for everyone to sit down. Also, the benches were very narrow so no one could lay down on them, and we all had to try to sleep on the floor.
10. There were no beds or other furniture, and we were not given any blankets or other bedding. We only had the thin aluminum blankets that they gave us. Everyone was very cold. I could not sleep at night because of the cold and the hard floor. The lights were left on all the time which also made it hard to sleep. I recently broke my arm and my arm

began to ache from the extreme temperature and the discomfort of sleeping on the floor. When we asked them to turn off the air-conditioning they simply ignored us.

11. There was one toilet with a sink on top of it. There was a short wall in front of it but it did not give us much privacy. Additionally, there was a security camera mounted right above the bathroom.
12. There was no soap and no toothpaste or toothbrushes. There were no towels and when we ran out of toilet paper and asked for more, the agents were slow to respond. We were not able to shower or bathe. The cell had no trash can so there was garbage sitting around on the floor. Everything was filthy and the room smelled awful.
13. The food was awful and we were only fed twice a day. We were given a small burrito for one meal, and crackers with boxed juice for another. It was not nearly enough food so we were all very hungry. One woman was detained with her three-year-old daughter, but they were not given any more food than the rest of us. There was water in a cooler but no cups. To drink water we had to use our old juice containers.
14. I was kept in this cell for two days and two nights, until I was taken to court in Tucson on December 4. Being held in conditions like that, I felt very bad. It felt like we were being treated like animals and not as human beings.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.

Jessica M. C.

CERTIFICATE OF TRANSLATION

1. My name is *Janna Foot*, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Jessica Margarito Catarino, in Spanish.
3. Jessica Margarito Catarino affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2014 in Florence, Arizona.



EXHIBIT 48

DECLARATION OF ROBERTO VARGAS MARTINEZ

I, Roberto Vargas Martinez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Roberto Vargas Martinez. I am a national of Mexico. I am thirty-two years of age.
2. I speak Spanish. I do not speak or read English.
3. U. S. Border Patrol agents arrested me on or around October 30, 2014 near Naco, Arizona.
4. I was transported to the Naco Border Patrol station. The trip lasted about fifteen minutes. I was driven there with a group of five people in a Border Patrol van.
5. At the Naco Border Patrol station, I was placed in a small cell that was only a few meters square. There were about fifteen other people in the cell, which was too many people for a cell that size. The cell smelled terribly and was very dirty. While I was there, the Border Patrol agents took people out and brought more people in, but for extended periods of time there were about fifteen to twenty people in the room.
6. The only furniture in the cell was a single concrete bench that ran along the side of the room. This was only enough space for approximately six or seven people to sit comfortably, so most people had to stand or sit on the floor.
7. I was kept in this cell for three nights and approximately seventy-two hours total. There were no beds in the cell. There were two dirty blankets in the cell that smelled of urine, but we were not provided with any other blankets or bedding.
8. The temperature in the cell was also very cold; even though it was cold outside, the air conditioning was on very high. When I was apprehended I was wearing an extra layer of pants and a jacket, but the Border Patrol agents took my jacket and extra layers from me, so all I was wearing was a short sleeve shirt and pants. We huddled together with the filthy blankets to try to keep warm but we were still very cold.
9. I had to try and sleep on the concrete floor but it was nearly impossible to sleep on the floor with the cell so cold and overcrowded and the smell so strong. The light was kept on all night which also made it very hard to sleep.
10. There was one toilet in the cell, with a sink and fountain mounted on top which was our only source of water. There were no towels or soap, only a single roll of toilet paper. The toilet was dirty and smelled terribly. There was a small plastic waste bin but it was full. It was impossible to wash your hands or clean yourself after using the toilet. There also were no toothbrushes or shower facilities, which is why the smell was so overpowering.

11. The only food we received was a packet of crackers and an orange, which we were given once daily. I was extremely hungry and exhausted the entire time I was detained.
12. After spending seventy-two hours, I was taken to Tucson for processing and then deported to Nogales. Border Patrol confiscated 2,000 Mexican pesos from me and did not return it.
13. The experience in detention was horrible. I felt psychologically traumatized by the abusive conditions in Border Patrol custody.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of November 2014 in Nogales, Sonora, Mexico.

11


CERTIFICATE OF TRANSLATION

1. My name is James Lyall, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, Roberto Vargas Martinez, in Spanish.
3. Roberto Vargas Martinez affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of November 2014 in Nogales, Sonora, Mexico.

A handwritten signature in black ink, appearing to be 'Roberto Vargas Martinez', written over a horizontal line.

EXHIBIT 49

DECLARATION OF HUGO EMILIO CUY SOLIS

I, Hugo Emilio Cuy Solis, hereby declare:


I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Hugo Emilio Cuy Solis. I am a national of Guatemala. I am 37 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I and my 13 year old son entered the US north of Altar, Sonora. We walked two days north through the desert before being detained by US Border Patrol Agents on February 9, 2015 at 4pm. By the time we were detained, we were exhausted because we had walked so much. We wanted to be detained because we were so tired.
4. One Border Patrol agent detained the two of us and put handcuffs on us and made us get onto the ATV. We drove through the desert for an hour as the agent drove around looking for other immigrants. During this time, we were constantly hit by bushes, spines, and other plants in the desert.
5. After an hour, we stopped driving and another five or six agents arrived with ATVs. They had detained three other immigrants. They made all of walk twenty minutes to their van. At the van there were another three immigrants. In total there were eight of us in the van.
6. While we were in the van, the Border Patrol agents tried to force us to sign a piece of paper that we did not understand nor did they explain to us. One part was in English and one part was in Spanish so we were not sure what it said in its totality. They said that whether or not we signed, we would be deported that day to Guatemala. They tried to get my son and me to both sign, but we refused.
7. My son and I were then transported to the Casa Grande Border Patrol station. The trip lasted about two hours.
8. Once at the Casa Grande Border Patrol station, I was placed in a cell that was about 3 meters by 3 meters large. There were ten people in total in the cell.
9. They called to my son and put him in another cell with other boys who were under 18 years old. They did not explain to me why they put my son in another cell. My son says that the cell was about the same as my cell.
10. The only furniture in the cell was one long concrete bench. If we had all tried to sit at once, we would not have fit. Instead, we laid on the ground.

11. I was kept in this cell for 11 hours. I spent 1 night in this cell. There were no beds in the cell and we were only given thin aluminum sheets. We had to sleep on the cold concrete floor.
12. The temperature in the cell was very cold. We were carrying thick blankets, but the Border Patrol agent took our blankets away before putting us in the cells. My son and I were only wearing short sleeve shirts. My son says that his cell was also very cold.
13. The thin aluminum blanket did not keep me warm. I had to curl up to stay as warm as possible but I was still cold. I could not sleep at all because of the cold and because the blankets made so much noise.
14. There was one toilet in the cell. The toilet was open to view.
15. There was one sink but no soap nor towels, so I could not wash my hands properly after using the bathroom. There also were no toothbrushes, and no bathing or shower facilities. I brought a toothbrush and it was taken away from me.
16. At the time that we were detained, we were exhausted. Neither my son nor I had eaten for a day and a half. We were also dirty from walking in the desert.
17. Several people in the cell asked to be able to shower and the agents said that we would have to wait another two hours, but we never actually had a chance to shower.
18. At the Border Patrol station, there was no doctor or nurse. One Border Patrol agent asked us if we were sick but did not actually give us a medical examination.
19. There was no water in the cell for the entire time that I was detained. My son says that there was no water in his cell either.
20. When we arrived at the station, we were given a packet of crackers and a juice. That was the only time while I was at the Casa Grande station that I was given food. I was very hungry because I had not eaten for a whole day and a half.
21. After spending 11 hours at the Casa Grande station, we were brought to the Tucson Border Patrol station.
22. We were in the Tucson station for five hours.
23. My thirteen year old son and I were also separated into different rooms upon our arrival in the Tucson station.
24. The cell in Tucson was slightly larger than the Casa Grande cell, but there were fourteen of us so it was still quite crowded.
25. The cell was similar to that of Casa Grande in that there were only concrete benches.

26. The bathroom facilities were only slightly better in Tucson, because at least the toilet was hidden behind a wall. Even so, there was no soap nor towel for the sink.
27. There was a water container in the cell in Tucson. There were no cups to drink the water, so we had to reuse our juice boxes.
28. At Tucson they only gave us a burrito and a packet of crackers. But we were still hungry because we had eaten so little.
29. I felt very sad and stressed while I was detained because I was worried about being deported to Guatemala.
30. I am afraid of returning to my country. There is a gang in our town who is threatening to kill my son and me if he does not join the gang. My son had to stop going to school because he was so afraid of what the gangs would do to him after school.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11 day of February, 2015 in Tucson, Arizona.



A handwritten signature in black ink, appearing to read "Miguel", is written over a horizontal line.

CERTIFICATE OF TRANSLATION

1. My name is *Joana Foot*, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, *Hugo Emilio Cuy Solis*, in Spanish.
3. *Hugo Emilio Cuy Solis* affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11 day of February 2015 in Tucson, Arizona.

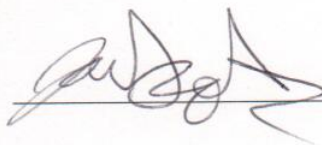


EXHIBIT 50

DECLARATION OF CESAR VERGARA JIMENEZ

I, Cesar Vergara Jimenez, hereby declare:

I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. My name is Cesar Vergara Jimenez. I am a national of Mexico. I am 39 years of age.
2. I speak and read Spanish. I do not speak or read English.
3. I was picked up by U. S. Border Patrol agents in Naco, Arizona on June 28, 2014, around 1:00 a.m.
4. I was transported to the Naco Border Patrol station. The trip lasted less than half an hour. I was driven there in a Border Patrol van. There were two other men in the van with me.
5. Once at the Naco Border Patrol station, I was placed in a cell that was about 15 feet by 20 feet. There were maybe 10 people in the cell when I got there, but they kept putting people in. At the end there were about 30 to 35 people in the cell. We were like cigarettes stuffed in there. The others were only men.
6. There were only concrete benches along the sides of the room and also some down the center of the room. There were about six of these benches in the cell. This was enough space for approximately 30 people to sit down. Because there was not enough room on the benches for everyone to sit at one time, some people had to stand or to sit on the floor.
7. I was kept in this cell for about 36 hours. I spent two nights in this cell. There were no beds in the cell and no blankets other than an aluminum sheet. My sheet and that of many of the men ripped, and when we asked for more, the guards got mad and they told us they did not have any more. I slept on the concrete floor. The light was kept on all night and it was hard to sleep.
8. The temperature in the cell was very, very cold. All I was wearing was a short sleeve shirt. I was not able to get warm. Even when I would put my arms inside my shirt, it was not enough. We asked the guards to change the temperature, but they would not change the temperature. Instead, the guards told us if we did not keep quiet they would make it even colder. The aluminum sheets we got did not keep us warm.
9. There were two toilets in the cell. The toilets were only partially screened from view. You had to wait in line to use the toilet and it was embarrassing. I had to close my eyes when going to the bathroom so I would not be embarrassed and when other people were using the bathroom we would try to close our eyes.
10. There were two sinks in the cell but no soap or paper or cloth towels. There also were no toothbrushes, toothpaste, or shower facilities. The smell was so bad because we could not

shower. People had been trying to cross in the desert for days and we all smelled. It was awful, just very ugly.

11. There was no water fountain in the cell. We had to drink water from the sink on top of the toilets and it was disgusting. I thought to myself, what if the water is dirty or the same water from the toilet? But I was thirsty and had to drink it anyway.
12. We were given something to eat twice a day. The food consisted of a burrito and a cookie twice a day. The food was disgusting, it smelled bad and sometimes the burrito was still cold. But I was so hungry that I had to eat it. That little bit of food was not enough, I was hungry all the time.
13. I asked to use the phone to call my family and was told that I could not make any phone calls at all and was never allowed to make one phone call.
14. I was never informed that I had a right to call the Mexican consulate.
15. I was kept in this cell in Naco for about 36 hours. I was then moved to another Border Patrol station in Tucson.
16. I was never permitted to go outside or even to leave my cell either in Tucson or Naco.
17. I was moved to another Border Patrol station after spending 36 hours in the first station. I spent a total of about 24 to 30 hours in a cell at the second Border Patrol station. The condition of the cell in the second station in Tucson was worse! The cell was a bit bigger but there were about 60 men in there or more. It was so crowded that we were all on top of each other. The benches and the floor were all covered with men sitting, standing or lying down. To get around you had to walk on the benches and jump from bench to bench to avoid stepping on people. It was just so crowded. In Tucson we ate the same food three times a day, and it was cold food. There was a jug of drinking water, and they had little paper cups, but there were not enough cups for all of us. We reused our little juice boxes and used them as drinking cups. When we ran out of water they would let one or two of us out to fill up the water jug. I spent one night in the second cell in Tucson. Like the first, there were no beds, and we only got a little thin aluminum sheet, and no blankets. Sleeping here was horrible. It was so crowded we had to just lay any way we could, sometimes on our sides, so we could fit more people. If you moved, someone else would take your spot. It was very cold at night sleeping on the concrete floor. I could only sleep on and off, it was so cold and uncomfortable.

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18. While I was detained at the Naco Border Patrol station, an agent gave me many documents to sign and initial but they did not let me read them or explain what the documents were.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of July 2014 in Florence, Arizona.


Cesar Vergara Jimenez

Cesar Vergara Jimenez

CERTIFICATE OF TRANSLATION

1. My name is JAMES LYALL, and I am fluent in Spanish and English.
2. I translated the foregoing document from English to Spanish and read it to the declarant, CESAR VERGARA JIMENEZ, in Spanish.
3. CESAR VERGARA JIMENEZ affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury of the laws that the foregoing is true and correct. Executed this 11th day of July 2014 in Florence, Arizona.



A handwritten signature in black ink, appearing to read 'Cesar Vergara Jimenez', is written over a horizontal line.

EXHIBIT 89.3

1 Harold J. McElhinny*
Kevin M. Coles*
2 Elizabeth G. Balassone*
MORRISON & FOERSTER LLP
3 425 Market Street
San Francisco, CA 94105-2482
4 Telephone: (415) 268-7000
Facsimile: (415) 268-7522
5 Email: HMcElhinny@mofocom
Email: KColes@mofocom
6 Email: EBalassone@mofocom

7 Colette Reiner Mayer*
MORRISON & FOERSTER LLP
8 755 Page Mill Road
Palo Alto, CA 94304-1018
9 Telephone: (650) 813-5600
Facsimile: (650) 494-0792
10 Email: CRMayer@mofocom

11 Attorneys for Plaintiffs

12 **Pro hac vice motions forthcoming*

13 Additional counsel on next page.

14

15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ARIZONA

17 JANE DOE #1; JANE DOE #2; NORLAN
18 FLORES, on behalf of themselves and all
others similarly situated,

19 Plaintiffs,

20 v.

21 Jeh Johnson, Secretary, United States
22 Department of Homeland Security, in his
official capacity; R. Gil Kerlikowske,
23 Commissioner, United States Customs &
Border Protection, in his official capacity;
24 Michael J. Fisher, Chief of the United States
Border Patrol, in his official capacity; Jeffrey
25 Self, Commander, Arizona Joint Field
Command, in his official capacity; Manuel
26 Padilla, Jr., Chief Patrol Agent-Tucson Sector,
in his official capacity,

27 Defendant.
28

Case No.

**DECLARATION OF
JAMES DUFF LYALL IN
SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION**

1 Louise C. Stoupe*
2 Pieter S. de Ganon*
3 MORRISON & FOERSTER LLP
4 Shin-Marunouchi Building, 29th Floor
5 5-1, Marunouchi 1-Chome
6 Tokyo, Chiyoda-ku 100-6529, Japan
7 Telephone: +81-3-3214-6522
8 Facsimile: +81-3-3214-6512
9 Email: LStoupe@mofocom
10 Email: PdeGanon@mofocom

Travis Silva*
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS OF THE SAN FRANCISCO
BAY AREA
131 Steuart Street, Suite 400
San Francisco, CA 94105
Telephone: (415) 543-9444
Facsimile: (415) 543-0296
Email: tsilva@lccr.com

11 Linton Joaquin*
12 Karen C. Tumlin*
13 Nora A. Preciado*
14 NATIONAL IMMIGRATION LAW
15 CENTER
16 3435 Wilshire Boulevard, Suite 2850
17 Los Angeles, CA 90010
18 Telephone: (213) 639-3900
19 Facsimile: (213) 639-3911
20 Email: joaquin@nilc.org
21 Email: tumlin@nilc.org
22 Email: preciado@nilc.org

23 Mary Kenney*
24 Emily Creighton*
25 Melissa Crow*
26 AMERICAN IMMIGRATION COUNCIL
27 1331 G Street NW, Suite 200
28 Washington, DC 20005
Telephone: (202) 507-7512
Facsimile: (202) 742-5619
Email: mkenney@immcouncil.org
Email: ecreighton@immcouncil.org
Email: mcrow@immcouncil.org

Victoria Lopez (Bar No. 330042)**
Daniel J. Pochoda (Bar No. 021979)
James Duff Lyall (Bar No. 330045)**
ACLU FOUNDATION OF ARIZONA
3707 North 7th Street, Suite 235
Phoenix, AZ 85014
Telephone: (602) 650-1854
Facsimile: (602) 650-1376
Email: vlopez@acluaz.org
Email: dpochoda@acluaz.org
Email: jlyall@acluaz.org

Attorneys for Plaintiffs

**Pro hac vice* motions forthcoming

**Admitted pursuant to Ariz. Sup. Ct. R. 38(f)

1 **DECLARATION OF JAMES DUFF LYALL IN SUPPORT OF PLAINTIFFS’**
2 **MOTION FOR CLASS CERTIFICATION**

3 I, JAMES DUFF LYALL, hereby declare:

4 1. I am a Staff Attorney at the American Civil Liberties Union Foundation of
5 Arizona (“ACLU-AZ”), and co-lead counsel for Plaintiffs in this litigation. I make this
6 declaration in support of Plaintiff’s Motion for Class Certification. If called as a witness,
7 I would and could competently testify to the facts stated herein, all of which are within my
8 personal knowledge.

9 2. I received a J.D. degree from Georgetown University Law Center in 2007. I
10 am an attorney at law admitted to practice before the District of Arizona. I was admitted
11 to the State Bar of California in 2008 and to the Arizona State Bar in 2011.

12 3. Beginning in 2014, I have directed, participated, and assisted in the
13 collection of the declarations of individuals formerly detained in CBP custody in Border
14 Patrol's Tucson Sector. The vast majority of those declarations were taken in southern
15 Arizona or Sonora, Mexico shortly after the individuals were released or transferred from
16 CBP custody, and usually within hours or days of release or transfer.

17 4. In July 2014, along with co-counsel in this litigation, I visited individuals
18 recently detained by CBP in Tucson Sector who were at that time incarcerated in a
19 privately-run federal prison in Florence, Arizona.

20 5. In advance of that visit, I obtained the names of the incarcerated individuals
21 from the daily Operation Streamline calendar, posted each weekday on the Arizona
22 District Court's website, and arranged for visitation at the Florence facility following the
23 Operation Streamline hearing.

24 6. Along with co-counsel, I met with several individuals and took declarations
25 regarding their recent experiences in CBP custody.

26 7. In December 2014, along with co-counsel, I conducted a second series of
27 meetings with individuals detained in the same facility, following the same procedures as
28 previously.

1 8. Additionally, from approximately December 2014 to April 2015, I directed
2 ACLU staff in collecting declarations and directly participated in the collection of
3 declarations from individuals released by CBP to Alitas House, a local halfway house for
4 families recently detained in CBP custody in Tucson Sector.

5 9. In March 2015, I visited and collected declarations from detainees in a
6 privately-run ICE immigration detention facility in Eloy, Arizona, regarding their recent
7 experiences in CBP custody.

8 10. In November 2014, I traveled to Sonora, Mexico where I visited and took
9 declarations from individuals recently repatriated to Nogales, Sonora, Mexico regarding
10 their recent experiences in CBP custody.

11 11. A true and correct copy of each of the following declarations of individuals
12 formerly detained by CBP in a Tucson Sector facility are attached:

- 13 • Declaration of Pablo Lopez Ruiz, as **Exhibit 1**;
- 14 • Declaration of Julio Jimenez Tucum, as **Exhibit 2**;
- 15 • Declaration of Adrian Tapia Rascon, as **Exhibit 3**;
- 16 • Declaration of Aurelio Ignacio Morales-Soto, as **Exhibit 4**;
- 17 • Declaration of Anselma Angela Ambrosio Diaz, as **Exhibit 5**;
- 18 • Declaration of Fernando Munguilla Erasno, as **Exhibit 6**;
- 19 • Declaration of Juan Jesus Padron Rios, as **Exhibit 7**;
- 20 • Declaration of Guadalupe Felipe Gaspar, as **Exhibit 8**;
- 21 • Declaration of Maria de Jesus Lopez Magdaleno, as **Exhibit 9**;
- 22 • Declaration of Julio Celso Chavez Ortiz, as **Exhibit 10**;
- 23 • Declaration of Jose Buelna Camacho, as **Exhibit 11**;
- 24 • Declaration of Jose Cruz Ruvalcaba Martinez, as **Exhibit 12**;
- 25 • Declaration of Brenda Chilel Lopez, as **Exhibit 13**;
- 26 • Declaration of Mario Roberto Zamora Diaz, as **Exhibit 14**;
- 27 • Declaration of Dolores Gonzalez Martin, as **Exhibit 15**;
- 28 • Declaration of Maria Ordonez Ortiz, as **Exhibit 16**;

- 1 • Declaration of Jose Luis Vergara Jimenez, as **Exhibit 17**;
- 2 • Declaration of Luis Alberto Franco-Cruz, as **Exhibit 18**;
- 3 • Declaration of Odilia Velasquez Vasquez, as **Exhibit 19**;
- 4 • Declaration of Victor Hugo Rosas Garcia, as **Exhibit 20**;
- 5 • Declaration of Valdemar Perez Perez, as **Exhibit 21**;
- 6 • Declaration of Araceli Castro Vasquez, as **Exhibit 22**;
- 7 • Declaration of Maria Lorena Lopez Lopez, as **Exhibit 23**;
- 8 • Declaration of Francisco Chay Quinones, as **Exhibit 24**;
- 9 • Declaration of Veronica Rodriguez Alvarado, as **Exhibit 25**;
- 10 • Declaration of Domitila Gomez Bartolom, as **Exhibit 26**;
- 11 • Declaration of Jose Garcia Rodriguez, as **Exhibit 27**;
- 12 • Declaration of Soledad Hernandez Yescas, as **Exhibit 28**;
- 13 • Declaration of Nelvia Mazoriegos Morales, as **Exhibit 29**;
- 14 • Declaration of Maura Velasquez Hernandez, as **Exhibit 30**;
- 15 • Declaration of Cecilio Medina Valencia, as **Exhibit 31**;
- 16 • Declaration of Celiflora Rodriguez Juarez, as **Exhibit 32**;
- 17 • Declaration of Nasario Gonzalez Peleaz, as **Exhibit 33**;
- 18 • Declaration of Angel Hernandez Reyes, as **Exhibit 34**;
- 19 • Declaration of Flora Elizabeth Gonzalez Gomez, as **Exhibit 35**;
- 20 • Declaration of Irma Veronica Lima Galicia, as **Exhibit 36**;
- 21 • Declaration of Yuri Perez Lopez, as **Exhibit 37**;
- 22 • Declaration of Sequen-Tesen Reyes Ovidio, as **Exhibit 38**;
- 23 • Declaration of Adriana Trujillo Hernandez, as **Exhibit 39**;
- 24 • Declaration of Luis Carlos Valladares Martinez, as **Exhibit 40**;
- 25 • Declaration of Adrian Vasquez Morales, as **Exhibit 41**;
- 26 • Declaration of Judith Soledad Morales Perez, as **Exhibit 42**;
- 27 • Declaration of Jesus Alfredo Mesa Barbosa, as **Exhibit 43**;
- 28 • Declaration of Reginalda Lopez Gomez, as **Exhibit 44**;

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- Declaration of Juan Reyes Martinez, as **Exhibit 45**;
- Declaration of Gustavo Huerta Saenz, as **Exhibit 46**;
- Declaration of Jessica Margarito Catarino, as **Exhibit 47**;
- Declaration of Roberto Vargas Martinez, as **Exhibit 48**;
- Declaration of Hugo Emilio Cuy Solis, as **Exhibit 49**;
- Declaration of Cesar Vergara Jimenez, as **Exhibit 50**.

12. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of June, 2015.

By: /s/ James Duff Lyall

James Lyall