

1 Lee Gelernt*
2 Judy Rabinovitz*
3 Anand Balakrishnan*
4 AMERICAN CIVIL LIBERTIES
5 UNION FOUNDATION
6 IMMIGRANTS' RIGHTS PROJECT
7 125 Broad St., 18th Floor
8 New York, NY 10004
9 T: (212) 549-2660
10 F: (212) 549-2654
11 *lgelernt@aclu.org*
12 *jrabinovitz@aclu.org*
13 *abalakrishnan@aclu.org*

Attorneys for Petitioner-Plaintiff
**Admitted Pro Hac Vice*

Bardis Vakili (SBN 247783)
ACLU FOUNDATION OF SAN
DIEGO &
IMPERIAL COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
T: (619) 398-4485
F: (619) 232-0036
bvakili@aclusandiego.org

Stephen B. Kang (SBN 292280)
Spencer E. Amdur (SBN 320069)
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
39 Drumm Street
San Francisco, CA 94111
T: (415) 343-1198
F: (415) 395-0950
samdur@aclu.org

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

14 Ms. L., et al.,

Petitioner-Plaintiff,

16 v.

17 U.S. Immigration and Customs Enforcement
("ICE"), et al.,

18 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD

Date Filed: August 2, 2018

**NOTICE OF SUPPLEMENTAL
DECLARATIONS**

1 Plaintiffs submit the two attached declarations in in support of their position
2 in the Joint Status Report of August 2, 2018: (1) Supplemental Declaration of
3 Michelle Brane and (2) Declaration of Nan Schivone.
4

5 Dated: August 2, 2018

Respectfully Submitted,

6 Bardis Vakili (SBN 247783)
7 ACLU FOUNDATION OF SAN
8 DIEGO & IMPERIAL COUNTIES
9 P.O. Box 87131
10 San Diego, CA 92138-7131
11 T: (619) 398-4485
12 F: (619) 232-0036
13 *bvakili@aclusandiego.org*

/s/Lee Gelernt
Lee Gelernt*
Judy Rabinovitz*
Anand Balakrishnan*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
125 Broad St., 18th Floor
New York, NY 10004
T: (212) 549-2660
F: (212) 549-2654
lgelernt@aclu.org
jrabinovitz@aclu.org
abalakrishnan@aclu.org

11 Stephen B. Kang (SBN 2922080)
12 Spencer E. Amdur (SBN 320069)
13 AMERICAN CIVIL LIBERTIES
14 UNION FOUNDATION
15 IMMIGRANTS' RIGHTS PROJECT
16 39 Drumm Street
San Francisco, CA 94111
T: (415) 343-1198
F: (415) 395-0950
skang@aclu.org
samdur@aclu.org

*Admitted Pro Hac Vice

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2018, I electronically filed the foregoing with the Clerk for the United States District Court for the Southern District of California by using the appellate CM/ECF system. A true and correct copy of this brief has been served via the Court’s CM/ECF system on all counsel of record.

/s/ Lee Gelernt
Lee Gelernt, Esq.
Dated: August 2, 2018