

1 Lee Gelernt*
2 Judy Rabinovitz*
3 Anand Balakrishnan*
4 AMERICAN CIVIL LIBERTIES
5 UNION FOUNDATION
6 125 Broad St., 18th Floor
7 New York, NY 10004
8 T: (212) 549-2660
9 F: (212) 549-2654
10 *lgelernt@aclu.org*
11 *jrabinovitz@aclu.org*
12 *abalakrishnan@aclu.org*

13 *Attorneys for Petitioners-Plaintiffs*
14 **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
39 Drumm Street
San Francisco, CA 94111
T: (415) 343-1198
F: (415) 395-0950
skang@aclu.org
samdur@aclu.org

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

17 Ms. L., et al.,
18 *Petitioners-Plaintiffs,*
19 v.
20 U.S. Immigration and Customs Enforcement
21 (“ICE”), et al.,
22 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD
DECLARATION OF NAN SCHIVONE
CLASS ACTION

1 1. I, Nan Schivone, make the following declaration based on my personal
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that
3 the following is true and correct:

4 2. I am an attorney licensed to practice law in the states of New York and Georgia
5 and am the Legal Director of Justice in Motion, a non-profit organization founded in
6 2005, which manages a Defender Network of human rights advocates and attorneys in
7 Mexico and Central America. See <http://justiceinmotion.org/>.

8 3. In my role as the Legal Director of Justice in Motion I coordinate our “case
9 facilitation” process, in which we match U.S. lawyers with members of our Defender
10 Network to partner on specific cases which require legal support work in the client’s
11 country of origin; through this work I have gained knowledge about information that
12 is necessary to locate named individuals in Guatemala and Honduras.

13 4. I was asked to identify what information we need to locate these parents.

14 5. We require the following information about parents: Parent’s place of birth,
15 contact information, including address – whether descriptive or standard – with
16 municipality and department (regional marker like state), phone number for parent or
17 any family members, indigenous language spoken if other than Spanish, and country-
18 specific identification number, such as DPI (Guatemala, "Documento Personal de
19 Identificación") or the Identity Number (Honduras, "la Cédula de Identidad").

20 6. We require the following information about their children: (1) Child's place of
21 birth, contact information, including address – whether descriptive or standard –with
22 village, town, municipality and department (regional marker like state), phone number
23 for parent or any family members, indigenous language spoken if other than Spanish;
24 and (2) name and contact information for child's assigned lawyer and case worker to
25 determine if they are in touch with the parents or have contact information for the
26 family and/or other details which would provide leads to locate deported parent.
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1 7. I have reviewed some of the addresses provided by the government for deported
2 parents, focusing on parents deported to Guatemala and Honduras. Many of the
3 addresses appear too general to provide a good lead for investigators. For example,
4 addresses that simply list “Guatemala City” in Guatemala, or “Olancho” in Honduras,
5 are of limited use in this search.

6 Executed this 2nd day of August 2018, in Decatur, Georgia.

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8 /s/Nan Schivone
9 NAN SCHIVONE
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