

# Exhibit First

## ICE FOIA Request 2020-ICFO-34364

**ice-foia@dhs.gov**  
to me

Apr 20, 2020, 11:36 AM

April 20, 2020

Ella Cleveland  
The Louise Trauma Center  
1234 Massachusetts Avenue, NW #1019  
Washington, DC 20005

**RE: ICE FOIA Case Number 2020-ICFO-34364**

Dear Dr. Cleveland:

This acknowledges receipt of your April 18, 2020, Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE), for all instructions, training manuals, and guidance given to the ICE lawyers at the office of Chief Counsel, 31 Hopkins Plaza, Baltimore MD 21201, provided from January 1, 2020 to the date you begin to process this request. Your request was received in this office on April 20, 2020.

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the DHS FOIA regulations, 6 C.F.R. Part 5, ICE processes FOIA requests according to their order of receipt. Although ICE's goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10- day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, ICE will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

Apr 27, 2020, 3:40 PM

April 27, 2020

Ella Cleveland  
The Louise Trauma Center  
1234 Massachusetts Avenue, NW #1019  
Washington, DC 20005

**RE: ICE FOIA Case Number 2020-ICFO-34364**

This e-mail is in regards to your April 18, 2020 ICE FOIA request for all instructions, training manuals, and guidance given to the ICE lawyers at the office of Chief Counsel, 31 Hopkins Plaza, Baltimore MD 21201, provided from January 1, 2020 to the date the request is processed.

In conducting a search for responsive records, the ICE FOIA office has determined that further clarification is needed regarding your request. Please provide a specific subject or topic of the instructions, training materials, and guidance for which you are seeking. This information will assist our office with conducting a reasonable search for specific items of interest. Please provide the ICE FOIA office with a response as soon as possible to avoid any further delay in the processing of your request. If a response is not received within 30 days, your request will be administratively closed.

Sincerely,

ICE FOIA



**Louise Trauma <louise.trauma.ltc@gmail.com>** Apr 28, 2020, 12:17 PM  
to ice-foia

Thank you for your email of April 27th.  
In response, we are interested in asylum, withholding of removal, Convention Against Torture, and how to cross-examine respondents.

Sincerely,  
Louise Trauma Center LLC

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Sincerely,

Louise Trauma Center  
c/o Dr. Ella Cleveland  
1234 Mass Ave NW #1019  
Washington, DC 20005