

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SARAH SHERMAN-STOKES, LAILA
HLASS, and MARY YANIK,

Plaintiffs

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

Civil Action No.

DECLARATION OF SARAH SHERMAN-STOKES

I, Sarah Sherman-Stokes, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney and Clinical Associate Professor of Law and Boston University School of Law, where I direct Boston University's Immigrants' Rights & Human Trafficking Program. I am one of the plaintiffs in this case and I also represent Plaintiffs in this case.
2. I submit this declaration to attach copies of certain documents referred to in Plaintiffs' Complaint for Injunctive and Declaratory Relief (ECF No. 1).
3. Attached as Exhibit 1 is a true and correct copy of the FOIA request sent by Plaintiffs on August 15, 2022 to Defendant U.S. Immigration and Customs Enforcement at Freedom of Information Act Office, U.S. Immigration and Customs Enforcement, 500 12th St., SW, Stop 5009, Washington, D.C. 20536-5009.
4. Attached as Exhibit 2 is a true and correct copy of the FOIA request sent by Plaintiffs on August 15, 2022 to Defendant U.S. Immigration and Customs Enforcement at Tae D. Johnson,

Acting Director, U.S. Immigration and Customs Enforcement, 500 12th St., SW, Washington, D.C. 20536.

5. Attached as Exhibit 3 is a true and correct copy of the FOIA request sent by Plaintiffs on August 15, 2022 to Defendant U.S. Immigration and Customs Enforcement at Melissa Harper, Field Office Director, U.S. Immigration and Customs Enforcement, New Orleans Field Office, 1250 Poydras Street, Suite 325. New Orleans, LA 70113.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this [REDACTED] day of December, 2023, at [REDACTED], Massachusetts.

SARAH SHERMAN-STOKES