

Exhibit A

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6 Attorneys for Plaintiffs
7 Immigration Center for Women and Children
8 ASISTA Immigration Assistance, Inc.

9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 IMMIGRATION CENTER FOR WOMEN AND
12 CHILDREN; ASISTA IMMIGRATION
13 ASSISTANCE, INC.,

14 Plaintiffs,

15 v.

16 U.S. CITIZENSHIP AND IMMIGRATION
17 SERVICES; U.S. DEPARTMENT OF
18 HOMELAND SECURITY,

19 Defendants.
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Case No. 3:20-cv-03000

**Declaration of Marc Van
Der Hout in Support of
Complaint for Declaratory
and Injunctive Relief
Under the Freedom of
Information Act**

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2 I, Marc Van Der Hout, do hereby declare:

3 1. I am a partner at Van Der Hout LLP located at 180 Sutter Street, Fifth
4 Floor, San Francisco, CA 94104. I have personal knowledge of each matter stated herein
5 because I am the attorney for Plaintiffs Immigration Center for Women and Children
6 (ICWC) and ASISTA Immigration Assistance, Inc., (ASISTA).

7 2. Plaintiff Immigration Center for Women and Children (ICWC) is a non-
8 profit legal organization providing free and affordable immigration services to
9 underrepresented immigrants in California and Nevada.

10 3. Plaintiff ASISTA Immigration Assistance, Inc., (ASISTA) is a national
11 non-profit organization that works to advance and protect the rights and routes to lawful
12 status of immigrant survivors of violence, especially those who have suffered gender-based
13 violence inside the United States.

14 4. On November 22, 2019, ICWC and ASISTA submitted a request for
15 documents and information to Defendants U.S. Citizenship and Immigration Services
16 (USCIS) and U.S. Department of Homeland Security (DHS) pursuant to the Freedom of
17 Information Act (FOIA). *See* Exhibit (Exh.) B to the Complaint.

18 5. On December 18, 2019, USCIS issued a notice stating that it received the
19 FOIA request on December 10, 2019, and assigning a control number for tracking purposes.
20 USCIS informed Plaintiffs that it had placed their FOIA request in the complex track (Track
21 2), invoked a 10-day extension of time, and granted Plaintiffs' fee waiver request. *See* Exh.
22 D to the Complaint.

23 6. Since that time, Plaintiffs have not received any additional correspondence
24 from USCIS. To date, USCIS has not produced any records in response to Plaintiffs' FOIA
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request. The request remains pending per the USCIS FOIA Request Status Information. *See* Exh. E to the Complaint.

7. All of the exhibits referenced above and attached to the Complaint are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 30th day of April, 2020, in San Francisco, California.

/s/Marc Van Der Hout
Marc Van Der Hout
Declarant