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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

East Bay Sanctuary Covenant; Al Otro Lado; Innovation Law Lab; and Central American Resource Center in Los Angeles,

Plaintiffs,

v.

Donald J. Trump, President of the United States, in his official capacity; Matthew G. Whitaker, Acting Attorney General, in his official capacity; U.S. Department of Justice; James McHenry, Director of the Executive Office for Immigration Review, in his official capacity; the Executive Office for Immigration Review; Kirstjen M. Nielsen, Secretary of Homeland Security, in her official capacity; U.S. Department of Homeland Security; Lee Francis Cissna, Director of the U.S. Citizenship and Immigration Services, in his official capacity; U.S. Citizenship and Immigration Services; Kevin K. McAleenan, Commissioner of U.S. Customs and Border Protection, in his official capacity; U.S. Customs and Border Protection; Ronald D. Vitiello, Acting Director of Immigration and Customs Enforcement, in his official capacity; Immigration and Customs Enforcement,

Defendants.

Case No.: 18-cv-06810

DECLARATION OF JENNIFER CHANG NEWELL IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED

[IMMIGRATION ACTION]

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**Pro hac vice application forthcoming*
***Application for admission forthcoming*

DECLARATION PURSUANT TO CIVIL L.R. 7-11(a)

I, JENNIFER CHANG NEWELL, declare:

1. I am an attorney at law licensed to practice in the state of California. I am a Managing Attorney at the American Civil Liberties Union Immigrants' Rights Project, and counsel for Plaintiffs in *Innovation Law Lab v. Nielsen*, Case No. 3-19-cv-00807 (N.D. Cal.)—Innovation Law Lab; Central American Resource Center of Northern California; Centro Legal de la Raza; Immigration and Deportation Defense Clinic at the University of San Francisco School of Law; Al Otro Lado; Tahirih Justice Center; John Doe; Gregory Doe; Bianca Doe; Dennis Doe; Alex Doe; Christopher Doe; Evan Doe; Frank Doe; Kevin Doe; Howard Doe; Ian Doe (collectively, "Plaintiffs"). I make this Declaration from personal knowledge, and if called to testify, I could and would testify competently thereto.

2. Pursuant to Civil Local Rule 7-11, an Administrative Motion must be accompanied by either a stipulation or a declaration that explains why a stipulation could not be obtained.

3. A stipulation regarding this motion could not be obtained because on February 14, 2019, the counsel for Defendants in *Innovation Law Lab* (Erez R. Reuveni) stated via email that Defendants oppose the motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2019, at San Francisco, California.

/s/Jennifer Chang Newell
JENNIFER CHANG NEWELL