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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EAST BAY SANCTUARY COVENANT, et al.,

Plaintiffs,

vs.

WILLIAM BARR, et al.,

Defendants.

Case No. 4:19-cv-04073-JST

[Judge: Hon. Jon S. Tigar]

DECLARATION OF CAROLINE HELLER

Date Action Filed: July 16, 2019

DECLARATION OF CAROLINE HELLER

I, Caroline J. Heller declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney at law and am of counsel with the law firm Greenberg Traurig, LLP ("GT"), counsel of record for Proposed Plaintiff-Intervenors, in the above-captioned matter. I make this declaration in support of Proposed Plaintiff-Intervenors' Reply in Further Support of their Motion for a Preliminary Injunction ("Motion"). Except where indicated on information and belief, the matters set forth herein are based upon my personal knowledge, and if called as a witness in this matter, I could and would testify competently thereto; as to the matters stated upon information and belief, I believe them to be true.

2. Attached hereto as Exhibit 5 is a true and correct copy of Defendant's Memorandum of Law in Opposition to Plaintiff's Cross Motion for Summary Judgment dated April 15, 2015 filed in *Washington Alliance of Technology Workers v. United States Department of Homeland Security*, Civil Action No. 14–529 (ESH) (D.D.C.)

3. Attached hereto as Exhibit 6 is a true and correct copy of Defendants' Response to Rule 28(j) Letter dated July 17, 2020 filed in *M.M.V. v. Barr* (D.C. Cir.), Nos. 20-5106 and 20-5129.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 26, 2020 in New York, New York.

/s/Caroline Heller
Caroline Heller