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**Pro hac vice*

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

PINEROS Y CAMPESINOS UNIDOS DEL
NOROESTE; AUGUSTANA LUTHERAN
CHURCH; OUR LADY OF GUADALUPE
PARISH; SAN FRANCISCO INTERFAITH
COUNCIL; WESTMINSTER PRESBYTERIAN
CHURCH; NATIONAL EDUCATION
ASSOCIATION; AMERICAN FEDERATION OF
TEACHERS; AMY LOMANTO; HANNA MAE
ANDERSON; LAUREN FONG; and CAROLINE
KEATING MEDEIROS,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; U.S.
DEPARTMENT OF HOMELAND SECURITY;
TODD LYONS, in his official capacity as Acting
Director of Immigration and Customs Enforcement;
U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; RODNEY S. SCOTT in his
official capacity as Commissioner of Customs and
Border Protection; U.S. CUSTOMS AND
BORDER PROTECTION,

Defendants.

Civil Action No.: 6:25-cv-699-AA

**DECLARATION OF A-A- IN
SUPPORT OF PLAINTIFFS
NATIONAL EDUCATION
ASSOCIATION AND AMERICAN
FEDERATION OF TEACHERS'
MOTION FOR STAY UNDER 5
U.S.C. § 705**

**DECLARATION OF A-A- IN SUPPORT OF PLAINTIFFS NATIONAL EDUCATION
ASSOCIATION AND AMERICAN FEDERATION OF TEACHERS' MOTION FOR
STAY UNDER 5 U.S.C. § 705**

I, A [REDACTED] A [REDACTED] ("A-A-"), upon my personal knowledge, hereby declare under penalty of perjury as follows:

1. My name is A-A-. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare to the facts stated herein.
2. I am offering this Declaration in my individual capacity and not on behalf of the institution that employs me.
3. I currently serve as a school nurse at a middle school in Minneapolis, Minnesota. I have been a nurse since 2010.
4. I hold a bachelor's degree in nursing and I am a registered nurse.
5. I am a member of the National Education Association (NEA) and the American Federation of Teachers (AFT).
6. My middle school is made up of approximately 78% students of color and 42% of our students are in the multilingual learner program.
7. Prior to January 2025, I was generally aware that immigration enforcement should not take place at or near schools, and during my seven previous years of serving as a school nurse, I never knew of any immigration enforcement taking place at any schools, including the schools where I have taught.
8. Sometime after January 2025, I learned about the revocation of the sensitive locations protection for schools. This change made me angry and frustrated, and I felt anxiety,

worry, and devastation about this loss of protection for my students.

9. Since December 2025, immigration enforcement vehicles are constantly driving in the area near my school and other schools in my school district. For example, they park their vehicles on a street diagonally across from the park that our students use for school recess, which is next to our school. Immigration enforcement officials have also used our school parking lot for staging activities.
10. Since early January 2026, numerous family members of students at my school have been taken by immigration enforcement officials at or very near school bus stops.
11. The murders of Renee Good and Alex Preti committed by immigration enforcement officials in January 2026 occurred 1 mile and less than 2 miles from my school. Roosevelt High School, where immigration enforcement officials released tear gas on students and teachers, is about 3 miles from my school. Many of the students at my school have siblings who attend Roosevelt High School.
12. The constant presence of immigration enforcement agents near my school has led students to express their fears about immigration raids. They talk at school about how scared they are and how worried they are about their families. I believe that these students are experiencing trauma due to the immigration enforcement actions taking place near our school and at school bus stops.
13. As an experienced school nurse, I worry about the cumulative effect of students' stress and fear from the presence of immigration enforcement near my school, which could have a negative long-term effect on their academic progress as well as their mental health.
14. Since immigration enforcement presence started to take place near our school in December 2025, student attendance has dropped dramatically. Of a total of 1,024

students, at least 400 students have switched to informal virtual learning during January 2026. There is a significant burden on teachers who are attempting to provide instruction to them virtually while teaching their in-person students as well.

15. Students' fears of immigration enforcement activity near our districts' schools prevent them from accessing health care provided at some of our high schools, including Roosevelt High School. These services are available for high school and middle school students. Students typically visit the clinics at those high schools for basic health care services such as vaccines, but they no longer access those services due to their fear of being detained or assaulted by immigration enforcement officials on their way to and from school. Students' absences also negatively affect their nutrition, given that many students rely on free school breakfast and lunch as an important part of their daily meals.
16. Teachers in my building who are people of color have been afraid to come to work due to the intense immigration enforcement actions and the murders of Renee Good and Alex Preti taking place near our school since early January 2026. Two of those teachers in our dual language program are planning to resign and move away from Minneapolis, and others are considering doing the same. The loss of these teachers will leave our multilingual learning program understaffed.
17. The constant presence of immigration enforcement agents near my school has created a stressful situation for me because I am constantly worried about immigration enforcement actions happening at or near our school. I just cannot understand why the government is targeting children, including children who came to the United States to escape violence in other countries. It makes me sick.
18. I am afraid that members of my community, members of the public, or my employer will

retaliate against or harass me and my family if my identity becomes public in connection with this lawsuit. I am also afraid that federal law enforcement may target me, my school, or my students as a result of my participation in this lawsuit.

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

Executed in [REDACTED], Minnesota on 2/9/2026.

/s/ AA

A [REDACTED] A [REDACTED]

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