

STEPHEN W MANNING, OSB No. 013373  
stephen@innovationlawlab.org,  
smanning@ilgrp.com  
INNOVATION LAW LAB  
333 SW 5th Ave., Suite 200  
Portland, OR 97204-1748  
Telephone: +1 503-922-3042

*\*Pro hac vice*

Additional counsel on last page

STANLEY YOUNG, CA No. 121180\*  
syoun@cov.com  
JEHAN A. PATTERSON, D.C. No. 1012119\*  
jpatterson@cov.com  
SABRINA MCGRAW, CA No. 334120\*  
smcgraw@cov.com  
AMBER LOWERY, D.C. No. 1780982\*  
alowery@cov.com  
ANALESE BRIDGES, D.C. No. 90029992\*  
abridges@cov.com  
EVAN CHIACCHIARO, D.C. No. 90037819\*  
echiacchiaro@cov.com  
COVINGTON & BURLING LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: +1-202-662-5129

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

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

I, C- C- ("C-C-"), upon my personal knowledge, hereby declare under penalty of perjury as follows:

1. My name is C-C-. 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 am afraid that federal law enforcement may retaliate against and target me, my school, or my students if my identity becomes public as a result of my participation in this lawsuit.
4. I currently serve as an English Language Learner (ELL) teacher on Long Island, New York.
5. I am a member of the National Education Association (NEA) and the American Federation of Teachers (AFT).
6. My high school has approximately 300 ELL students who come from many different countries.
7. I was aware of the sensitive locations policy for more than a decade, because it is highly relevant to my students' families. As part of my beginning-of-year introductions to students, I used to emphasize that regardless of what was going on with immigration enforcement in the wider community, they were safe at school.
8. School has felt different ever since the policy was rescinded. Now, I hear students say things like "la migra is coming for me," and I can no longer assure them that would not happen while at school. My students talk to me about feeling afraid.

9. Because school now feels so tense, my colleagues and I have had to deal with more behavioral issues from students, which makes our jobs more stressful and challenging. As a Spanish-speaking teacher, I have accordingly been called on to do more calling students' homes and translating for disciplinary matters and student mental health issues.
10. Many of my students' parents are afraid to come to the school building as well, so we have been experiencing a decrease in parent involvement. These are parents who typically are very supportive in partnering with us, but we expect much lower attendance at parent/teacher conferences this week. This makes it harder for me to ensure that my students are on track and requires extra work to engage with families in other ways.
11. My entire ELL department feels on edge essentially all school day, waiting to see if something will happen.

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] NY on 2/9/2026.

C-C

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C [REDACTED] C [REDACTED]

STEPHEN W MANNING, OSB No. 013373  
stephen@innovationlawlab.org,  
smanning@ilgrp.com  
TESS HELLGREN, OSB No. 191622  
tess@innovationlawlab.org  
RACHEL LANDRY, Mass. No. 713320\*  
rachel@innovationlawlab.org  
NELLY GARCIA ORJUELA, OSB No. 223308  
nelly@innovationlawlab.org  
INNOVATION  
LAW LAB  
333 SW 5th Ave., Suite 200  
Portland, OR 97204-1748  
Telephone: +1 503-922-3042

STANLEY YOUNG, CA No. 121180\*  
syoun@cov.com  
JEHAN A. PATTERSON, D.C. No. 1012119\*  
jpatterson@cov.com  
SABRINA MCGRAW, CA No. 334120\*  
smcgraw@cov.com  
AMBER LOWERY, D.C. No. 1780982\*  
alowery@cov.com  
ANALESE BRIDGES, D.C. No. 90029992\*  
abridges@cov.com  
EVAN CHIACCHIARO, D.C. No. 90037819\*  
echiacchiaro@cov.com  
Covington & Burling LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: +1-202-662-5129

Attorneys for Plaintiffs

*\*Pro hac vice*

*\*\*Pro hac vice application forthcoming*

BRANDON GALLI-GRAVES, Tx. No. 24132050\*  
brandon.galli-graves@justiceactioncenter.org  
ESTHER H SUNG, Cal. No. 255962\*  
esther.sung@justiceactioncenter.org  
KAREN C TUMLIN, Cal. No. 234961\*  
karen.tumlin@justiceactioncenter.org  
HILLARY LI, Ga. No. 898375\*  
hillary.li@justiceactioncenter.org  
LAURA FLORES-PERILLA, Cal. No. 355645\*  
laura.flores-perilla@justiceactioncenter.org  
EMILY SATIFKA, Nj. No. 330452020\*  
emily.satifka@justiceactioncenter.org  
JUSTICE ACTION CENTER  
PO Box 27280  
Los Angeles, CA 90027  
Telephone: +1 323-450-727

Attorneys for Plaintiffs

DANIEL MCNEIL, D.C. No. 455712\*\*  
dmcneil@aft.org  
CHANNING COOPER, Md. No. 1212110182\*  
ccooper@aft.org  
AMERICAN FEDERATION OF  
TEACHERS  
555 New Jersey Avenue, N.W.  
Washington, D.C. 20001  
Telephone: +1 202-879-4400

Attorneys for Plaintiff American  
Federation of Teachers

LUBNA A. ALAM, DC No. 982169\*  
lalam@nea.org  
KATHERINE E. LAMM, DC No. 1006319\*  
klamm@nea.org  
NATIONAL EDUCATION  
ASSOCIATION

1201 16th Street NW  
Washington, DC 20036  
(202) 822-7035

Attorneys for Plaintiff National  
Education Association