

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*
syoung@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 [REDACTED] C [REDACTED] ("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

[REDACTED] [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*
syoung@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