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

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

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

1. My name is J-V-. 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 an English as a Second Language (ESL) teacher in a middle school in Ohio. I have been teaching for a total of 17 years.
4. My school has approximately 33% Hispanic students and 20% Black students.
5. I hold a master's degree in multicultural education.
6. I am a member of the National Education Association (NEA).
7. Before January 2025, it was my understanding that schools were a safe space with respect to immigration enforcement. In my 13 years of teaching ESL, I never knew of any immigration enforcement taking place at a school, including the school where I taught.
8. Shortly after January 2025, I learned that the sensitive locations protection for school had been revoked, which shocked and concerned me.
9. Since late December 2025, there has been significant immigration enforcement activity near my school and other schools in my district. Federal immigration enforcement vehicles have been parked on the street within a block of our school on a regular basis.

10. On or about January 23, 2026, a middle school student in my building was detained by immigration enforcement officials when he was waiting at his school bus stop.
11. As a result of the immigration enforcement actions near our school and at school bus stops, our students have been very anxious and fearful at school. Their concern about immigration enforcement near our school is evidenced by a student walkout which took place on February 3, 2026.
12. Students cannot learn if they are continuously fearful when they are at school.
13. As a result of the immigration enforcement actions near our school and at school bus stops, we have seen a significant decline in student attendance since December 2025. For example, just before the break in December, only about 50% of students came to school because of rumors of immigration enforcement in the area surrounding the school. This decline in attendance continued into January 2026 as immigration enforcement near the school became even more prevalent. Parents of ESL students have told other school staff that they are not sending their students to school because they are afraid of immigration enforcement at or near their school.
14. Students' absences make it more difficult for me to teach, because I need to spend extra time ensuring that these students have access to the academic material and complete assignments from home.
15. These effects from immigration enforcement actions near our school and at school bus stops have created a great deal of stress for me, making this my hardest year ever for teaching, and causing me to be very emotional even after I get home from school.
16. The immigration enforcement actions near our school and at school bus stops has led to a

decline in our enrollment in ESL classes. Typically, we have at least 10 to 12 students enrolled in the ESL newcomers class, but we currently only have 7 students enrolled in that class. This decline in enrollment could mean that an ESL position at my school is eliminated.

17. 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], Ohio on February 8, 2026.

/s/ JV

J [REDACTED] V [REDACTED]

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