

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

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

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

1. My name is M-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 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 teach at a high school in Ypsilanti, Michigan. My school is very diverse and has approximately 40% English Language Learners.
5. I am a member of the National Education Association (NEA).
6. Before January 2025, I learned of the sensitive location policy as part of my job preparation to teach English Language Learners. Therefore, I was not concerned about immigration enforcement happening at school. In fact, I would reassure students and their parents by reminding them that school was the safest place for them.
7. When the policy was rescinded in January 2025, I began to feel unease about the possibility of immigration enforcement near school, even though things did not change right away.
8. On January 27, 2026, immigration enforcement agents took one of my students' parents into custody while parents were waiting at a school bus stop. That student has not come to school since their parent's arrest.

9. Shortly after this incident, my students experienced extreme bus delays because the district had to figure out how to transport elementary and pre-K students home safely.
10. Also since this incident, some of my students' family members check in with them via phone constantly while they are at school to see if the child is safe. This is disruptive to the student's learning and to the classroom environment.
11. It is clear that students are feeling very stressed. For example, we recently had to do a regularly scheduled lockdown drill, and before the students realized it was practice, many expressed terror that ICE had come to the school and that is why we were locking down.
12. I feel horrible not being able to promise kids that they will be safe at school.
13. Many of the students at my school recently switched to online learning, which I believe was out of fear for their safety due to the presence of immigration enforcement officers nearby. However, the online classes offered by my district are offered only in English, so many of my ELL students will not be able to understand them.
14. Many students are also simply absent from school since the January 27 incident. This increases my workload because I spend a lot of time trying to get in touch with students via different phone numbers or friends.
15. Because I teach at a Title I school, I am also very concerned that students who rely on the school for their meals are going without food and crucial supplies.
16. I am very confident that if school were still a safe haven – and families knew that – more of the missing students would attend and would be able to get the educational services (and food) that they need.
17. Some of my colleagues have told me that they feel at a total loss of what to do since we cannot ensure students' safety at school. Some are even afraid for themselves because they

might be perceived as non-citizens, or because they might experience violence from immigration enforcement officers if they do come to school for students or their parents.

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] MI on 2/9/26.

/s/ MA

M [REDACTED] A [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