

STEPHEN W MANNING, OSB No. 013373  
[stephen@innovationlawlab.org](mailto:stephen@innovationlawlab.org),  
[smanning@ilgrp.com](mailto: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](mailto:syoung@cov.com)  
JEHAN A. PATTERSON, D.C. No. 1012119\*  
[jpatterson@cov.com](mailto:jpatterson@cov.com)  
SABRINA MCGRAW, CA No. 334120\*  
[smcgraw@cov.com](mailto:smcgraw@cov.com)  
AMBER LOWERY, D.C. No. 1780982\*  
[alowery@cov.com](mailto:alowery@cov.com)  
ANALESE BRIDGES, D.C. No. 90029992\*  
[abridges@cov.com](mailto:abridges@cov.com)  
EVAN CHIACCHIARO, D.C. No. 90037819\*  
[echiacchiaro@cov.com](mailto: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 S-G- IN  
SUPPORT OF PLAINTIFFS  
NATIONAL EDUCATION  
ASSOCIATION AND AMERICAN  
FEDERATION OF TEACHERS'  
MOTION FOR STAY UNDER 5  
U.S.C. § 705**

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

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

1. My name is S-G-. 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 teacher in South Portland, Maine, and work with students at each school in the district. I have been a teacher for over 15 years.
4. I am a member of the National Education Association (NEA).
5. Our district is increasingly diverse and includes many refugees. Now, it includes about 30-40% of students who require specialized learning programs such as English Language. Many students are undergoing huge transitions, processing recent trauma, and experiencing housing insecurity.
6. Before January 2025, I believed that immigration enforcement operations generally couldn't take place at schools because I remember hearing about it as a member of my school's civil rights team. Therefore, even though there had long been pockets of ICE activity in our area in general, I was not concerned about operations taking place at school. I do recall being worried in previous years that the policy might change, so I tracked developments closely. Fortunately, it remained in place.

7. I learned about the sensitive location policy's rescission in 2025 when one of the Multilingual teachers alerted staff to the change. I was very concerned about this change and what it signaled about the world, and it reminded me of the type of targeting and discrimination my ancestors experienced in the last century.
8. I was concerned about schools, since that is where I work, but I also was very concerned about hospitals as sensitive locations. My child required major surgery at a young age, and I remember the vulnerability of that time and needing to feel totally safe at the hospital and with the doctor. I felt devastated that families would not have that anymore.
9. Immigration agents have recently been very close to a school where I work. I was driving to work when I saw several of their cars across the street about a block away from the school, parked in front of two businesses. Students were also arriving at school at this time, and staff members rushed out of the building to stand along the road so that students could pass by safely.
10. I have heard reports of ICE hanging around school bus stops in my district in what look like "stake outs." I feel that this is an attempt to intimidate our school community. In response, administrators and other adult volunteers have begun riding the bus with students, even delivering some students to and from their door.
11. My own children, who are students in my district, all have friends who have stopped attending school due to fear of immigration enforcement on their way to or at school, or have had a parent or older sibling detained by ICE.
12. It feels horrible not to be able to keep students safe. I can no longer even tell students that school is a particular *place* where they are safe.
13. Staff members are afraid, too. Some service employees, in particular, have understandably

refused to come to school because they are afraid of getting picked up while here.

14. As a result, we have had minimal or no custodial staff around the district, so my colleagues and I have been stepping up to help with that. This is a humongous undertaking and has greatly increased our workload. Many of my colleagues are starting to burn out, and the number of days where teachers are calling out of work has increased significantly so that people can take care of themselves when they need to. But this leaves even more work for others.
15. Teachers have taken on additional work and emotional labor that is way beyond everyone's breaking point. I am very worried that we are all becoming traumatized, including secondary trauma from what we are seeing our students go through.
16. 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.

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] ME on 2/10/26.

/s/ SG

S [REDACTED] G [REDACTED]

STEPHEN W MANNING, OSB No. 013373  
[stephen@innovationlawlab.org](mailto:stephen@innovationlawlab.org), [smanning@ilgrp.com](mailto:smanning@ilgrp.com)  
TESS HELLGREN, OSB No. 191622  
[tess@innovationlawlab.org](mailto:tess@innovationlawlab.org)  
RACHEL LANDRY, Mass. No. 713320\*  
[rachel@innovationlawlab.org](mailto:rachel@innovationlawlab.org)

BRANDON GALLI-GRAVES, Tx. No. 24132050\*  
[brandon.galli-graves@justiceactioncenter.org](mailto:brandon.galli-graves@justiceactioncenter.org)  
ESTHER H SUNG, Cal. No. 255962\*  
[esther.sung@justiceactioncenter.org](mailto:esther.sung@justiceactioncenter.org)

NELLY GARCIA ORJUELA, OSB No.223308  
[nelly@innovationlawlab.org](mailto: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](mailto:syoung@cov.com)  
JEHAN A. PATTERSON, D.C. No. 1012119\*  
[jpatterson@cov.com](mailto:jpatterson@cov.com)  
SABRINA MCGRAW, CA No. 334120\*  
[smcgraw@cov.com](mailto:smcgraw@cov.com)  
AMBER LOWERY, D.C. No. 1780982\*  
[alowery@cov.com](mailto:alowery@cov.com)  
ANALESE BRIDGES, D.C. No. 90029992\*  
[abridges@cov.com](mailto:abridges@cov.com)  
EVAN CHIACCHIARO, D.C. No. 90037819\*  
[echiacchiaro@cov.com](mailto: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*

KAREN C TUMLIN, Cal. No.  
234961\*  
[karen.tumlin@justiceactioncenter.org](mailto:karen.tumlin@justiceactioncenter.org)  
HILLARY LI, Ga. No. 898375\*  
[hillary.li@justiceactioncenter.org](mailto:hillary.li@justiceactioncenter.org)  
LAURA FLORES-PERILLA, Cal.  
No. 355645\*  
[laura.flores-perilla@justiceactioncenter.org](mailto:laura.flores-perilla@justiceactioncenter.org)  
EMILY SATIFKA, Nj. No. 330452020\*  
[emily.satifka@justiceactioncenter.org](mailto: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](mailto:dmcneil@aft.org)  
CHANNING COOPER, Md. No.  
1212110182\*  
[ccooper@aft.org](mailto: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](mailto:lalam@nea.org)  
KATHERINE E. LAMM, DC No. 1006319\*  
[klamm@nea.org](mailto:klamm@nea.org)  
NATIONAL EDUCATION ASSOCIATION  
1201 16th Street NW  
Washington, DC 20036  
(202) 822-7035

Attorneys for Plaintiff National Education  
Association