

# EXHIBIT M

**DECLARATION OF MIRTA LAURA CONTRERAS, ESQ.**

I, Mirta Laura Contreras, Esq., declare as follows:

1. I submit this declaration in connection with Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts set forth herein, and, if called as a witness, could and would testify competently as follows:

2. I am an immigration staff attorney with the Northwest Immigrant Rights Project ("NWIRP"), Granger Office in Granger, Washington. NWIRP is a 501(c)(3) nonprofit organization that provides direct immigration services to low income immigrants in Washington State and has been in operation for more than 30 years. The Granger office provides legal consultations and representation at a reduced rate for individuals living in Eastern Washington who cannot afford a private attorney and meet our requirements based on family income, legal eligibility, and available resources.

3. I graduated in 1990 from the University of Oregon School of Law. I have worked on behalf of immigrant communities, primarily Latino farm workers in Eastern Washington, during my entire legal career and have been specializing exclusively on immigration-related issues since August 2011, when I joined NWIRP. Previously, I worked as a staff attorney at Columbia Legal Services, where my work focused on employment discrimination, workplace harassment, and family law on behalf of immigrant survivors of domestic violence.

4. I have expertise representing immigrants in removal proceedings and have represented some juveniles seeking Special Immigrant Juvenile Status and other forms of immigration relief, such as asylum, U visas, and Deferred Action for Childhood Arrivals. I am presently one of two attorneys representing immigrants in removal proceedings for the Granger office. I am also the office's directing attorney, responsible for ensuring the effective delivery of

immigration legal services to eligible clients in rural Eastern Washington and supervising a staff of two attorneys, two accredited representatives, and one support staff. I carry an active caseload of 60 cases at a time, and have carried a caseload of approximately that size for about 2 years. As the office's directing attorney I also coordinate our work with the other NWIRP offices, which provide services to persons living in Western Washington, and to persons who are detained at the Northwest Detention Center.

5. In recent years, the NWIRP Granger office, like legal service providers across the country, has received increasing calls for assistance from numerous children who have fled their home countries—primarily from El Salvador, Guatemala, Honduras, and Mexico. Most of the children have been placed in removal proceedings, are eligible for immigration relief, and need representation in their removal cases.

6. I have seen children coming from California and Texas who have had their removal cases transferred to the Seattle Immigration Court. These children are typically apprehended by U.S. Customs and Border Protection near the Southern border in Arizona or South Texas, and relocated to the care of a sponsor identified by the Office of Refugee Resettlement who is living in this area. Other children are already living here but are placed in removal proceedings after enforcement actions from Immigration and Customs Enforcement. The Seattle Immigration Court has a juvenile docket for detained minors; children who are not detained, however, have their cases placed on the regular adult docket, and it is thus difficult to keep track of just how many children have cases in the Seattle Immigration Court.

7. I have, however, seen the number of children seeking representation services from the NWIRP Granger office increase steadily in the last year. In the month of June 2014, for example, we received requests for assistance from six minors in removal proceedings. At this

point all of them are on our waiting list for intakes, and it is unclear if we will be able to take any of their cases. The NWIRP Granger office makes every effort to help these children; unfortunately, due to our limited resources, we do not always have the ability to offer children even an intake appointment. This is because we are also responsible for intakes and representation of adults in removal proceedings who live in Eastern Washington, as well as representation of immigrants filing affirmative applications for immigration benefits outside of removal proceedings (e.g., naturalization applications and family visa applications). We simply don't have the capacity to assist all the children who come to us.

8. Other NWIRP offices are also facing a similar need; I am aware that in June 2014 alone, the Asylum Unit in our Seattle office conducted intake interviews with eight children who are in immigration proceedings. Many other children are screened through our general intake system, or referred to the King County Bar Association legal clinic.

9. As the directing attorney in Granger, I receive emails and phone calls from nonprofit organizations all over the country who are seeking to find legal representation for the children they have represented and who are now residing in Eastern Washington. Earlier this year, confronted with the many children seeking legal representation coming to our office, I met with representatives from other local legal service providers in an effort to develop a concerted strategy to address the needs of these children. However, what was clear was that the other organizations mostly needed to determine if NWIRP had capacity to take more children's cases, as they could not.

10. From time to time, I have been able to refer some of these children to private immigration attorneys in the community. However, many of these children will go without

representation because their families or support networks, if they have any, simply do not have the money to hire an attorney to represent them in their removal proceedings.

11. As a practical matter, it is difficult if not impossible for most children in immigration proceedings to obtain relief from deportation without legal representation. The forms of relief are generally factually and legally complex, and require the applicant to marshal evidence, corroborating documentation, and legal arguments in order to succeed. Moreover, the procedural steps needed to obtain such relief can be intricate and difficult to execute without the aid of a trained lawyer who knows how to navigate the system. Thus, legal representation is critical for children in immigration proceedings in order to pursue the claims and relief for which they may be eligible.

I declare under penalty of perjury of the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of July, 2014 in Granger, Washington.

  
MIRTA LAURA CONTRERAS, ESQ.