

DECLARATION OF LEILA KANG

1. My name is Leila Kang and I am a Law Graduate staff member at the Northwest Immigrant Rights Project.
2. On August 26, 2014, I observed a bond hearing at the Tacoma Immigration Court, which is located at 1623 East J Street, Suite 3, Tacoma, Washington. The name of the respondent was Maria Sandra Rivera, A #206-717-040. The Immigration Judge who presided over the hearing was John C. Odell, and the Department of Homeland Security was represented by Joseph Silvio. Ms. Rivera was represented by Elizabeth Benki.
3. At the beginning of the hearing, Ms. Benki asked Judge Odell if he had received her argument in support of granting release for Ms. Rivera under conditional parole. Judge Odell responded that he had, and he stated that the Court had no jurisdiction to grant conditional parole to Ms. Rivera.

I, Leila Kang, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Tacoma, Washington, this 26th day of August, 2014.



Signature

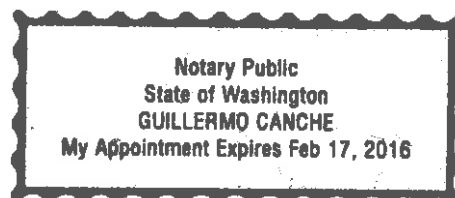
Leila S. Kang

Printed Name

Subscribed and sworn before me this 26th day of August, 2014 in Pierce County, Washington. My commission expires on February 17, 2016.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I further certify that copies of the same will be served, via United States Postal Service, Certified Mail, Return Receipt Requested, to the following on October 17, 2014:

Natalie Asher
Field Office Director, Seattle Field Office
U.S. Immigration & Customs
Enforcement
12500 Tukwila International Blvd.
Seattle, WA 98168

Lowell Clark
Warden
Northwest Detention Center
123 East J St.
Tacoma, WA 98421

Eric J. Holder, Jr.
Attorney General for the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

Jeh Johnson
Secretary, U.S. DHS
Department of Homeland Security
Washington, DC 20528

Juan Osuna
Director,
Exec. Office for Immigration Review
5107 Leesburg Pike, Suite 2600
Falls Church, VA 20530

Thomas Winkowski
Principal Deputy Assistant Secretary,
U.S. Immigration & Customs Enforcement
c/o Office of the General Counsel
U.S. Department of Homeland Security
Washington, DC 20528

United States of America
c/o Annette Hayes
Acting U.S. Attorney for W.D. Washington
700 Stewart Street, Suite 5220
Seattle, WA 98101

Dated: October 16, 2014, at Seattle, Washington.

/s/ Sarah Dunne

Sarah Dunne, WSBA No. 34869

Attorney for Plaintiff

CERTIFICATE OF SERVICE

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 SECOND AVE., STE. 400
SEATTLE, WA 98104
TELEPHONE (206) 957- 8611
FAX (206) 587-4025