

EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RÜMEYSA ÖZTÜRK,

Petitioner,

v.

DONALD J. TRUMP, et al.,

Respondents.

Civil Action No. 1:25-cv-10695-DJC

DECLARATION OF STEFANIE FISHER-PINKERT, ESQ.

I, Stefanie Fisher-Pinkert, declare the following under pain and penalty of perjury:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts.

I am also admitted to the Federal District Court for the District of Massachusetts, the Federal District Court for the District of Nebraska, and the First Circuit Court of Appeals.

2. Since obtaining my license in November of 2009, I have specialized in immigration law, and specifically in removal defense. I have been a member of the American Immigration Lawyers Association (“AILA”) since January of 2010. As a member of AILA, I have served in various volunteer positions, including as a member of the Federal Litigation Committee, as a liaison to the Office of Chief Counsel of U.S. Immigration and Customs Enforcement (“ICE”), and as a liaison to U.S. Customs and Border Protection. I am currently Counsel in the law firm Araujo & Fisher.

3. Throughout my legal career, I have represented detained individuals in New England facing removal/deportation proceedings or otherwise slated for removal/deportation. The statements in this declaration are based on my personal knowledge accumulated during my years of immigration practice.

4. My coworkers and I have represented women in civil immigration detention, including women detained at the Strafford County facility in Dover, NH, and ICE's Buffalo facility in Batavia, NY.

5. In my experience, ICE Enforcement and Removal Operations regularly processes individuals they detain in eastern Massachusetts at their Boston Field Office, located in Burlington, Massachusetts. People arrested by ICE's Homeland Security and Investigations ("HSI") are regularly booked and processed at HSI's offices in Boston, Massachusetts.

6. In my experience, ICE regularly detains women at their facilities in New England, including the Strafford County facility in New Hampshire, at the Wyatt Detention facility in Rhode Island, and at the Cumberland County facility in Maine.

7. I have reviewed the Declaration of David T. Wesling. In my 16 years of practice, I have not seen or even heard of an ICE detainee arrested in Massachusetts being booked and repeatedly moved in the manner described in that declaration. I have never seen or even heard of an ICE detainee arrested in Massachusetts being moved to Methuen, Massachusetts, then Lebanon, New Hampshire, then St. Albans, Vermont, within a matter of hours. The conduct described in Mr. Wesling's declaration is, in short, highly irregular.

Executed on April 2, 2025, in Boston, MA.



Stefanie Fisher-Pinkert