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23 *Attorneys for Movant Jon Doe*

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28 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

29 *In the Matter of Subpoena Number HSI-DC-2026-*  
30 *007280-001:*

31 JON DOE,

32 Movant,

33 v.

34 THE UNITED STATES DEPARTMENT OF  
35 HOMELAND SECURITY,

36 Respondent.

37 Misc. Case No.:

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**DECLARATION OF JENNIFER**  
**STISA GRANICK IN SUPPORT OF**  
**MOTION TO QUASH**  
**ADMINISTRATIVE SUBPOENA**

42 Date: To be set by the Court  
43 Time: To be set by the Court  
44 Courtroom: To be set by the Court

1 I, JENNIFER STISA GRANICK, declare as follows:

2 1. I am an individual over 18 years of age and counsel to Movant in this action. I am admitted to  
3 the bar of this Court. I can testify to the following matters from personal knowledge.

4 2. I have in my possession a copy of a signed declaration of Jon Doe (“Doe”), which is dated  
5 February 1, 2026, and signed by hand in Doe’s real name, not Doe’s pseudonym. I have prepared a  
6 pseudonymous declaration of Doe that is identical in content to the signed version, but replaces Doe’s  
7 name with a pseudonym. That pseudonymous declaration is also signed using “/s/ Jon Doe” rather than  
8 Doe’s real name.

9 3. To protect Doe’s anonymity, counsel in this action will file a true and correct copy of the  
10 pseudonymous declaration of Doe as an attachment to the Motion to Quash Administrative Subpoena.  
11 The Doe Declaration attaches the subpoena to Google as Exhibit E. The only difference between that  
12 exhibit and the subpoena as provided by Google is that Doe’s email address (which contains his real  
13 name) is redacted. The other redactions to the subpoena were present on the version provided to Doe by  
14 Google.

15 4. I have corresponded with Doe about the declaration and Doe has provided me with the subpoena  
16 that Doe received from Google and the correspondence between Google and Doe to which the subpoena  
17 was attached. I am confident that the person who signed the declaration in Doe’s real name is the person  
18 whose Google account is targeted by the subpoena.

19 5. Attached to this declaration are true and correct copies of the three Washington Post articles  
20 about the government’s attempt to deport the Afghan asylum-seeker “H”.

21 6. Attached as **Exhibit A** is a copy of the article published on October 14, 2025: John Woodrow  
22 Cox, *He Supported the U.S. War in Afghanistan. Now He May Be Deported to the Taliban*, Wash. Post  
23 (Oct. 14, 2025), <https://www.washingtonpost.com/investigations/2025/10/14/trump-immigration-afghanistan-asylum-deportation/>.

1     7. Attached as **Exhibit B** is a copy of the article published on October 30, 2025: John Woodrow  
 2 Cox, *Trump Administration Makes Misleading Case in High-Stakes Asylum Hearing*, Wash. Post (Oct.  
 3 30, 2025), <https://www.washingtonpost.com/investigations/2025/10/30/trump-asylum-afghanistan-deport-immigration/>.

5     8. The comments link at the bottom of that article reflects that readers have left 1,241 comments.  
 6 Clicking on that link reveals the comments, which are overwhelmingly critical of the U.S. government's  
 7 conduct in H's asylum case. For example, one commenter wrote: "This is outrageously indefensible."  
 8 Another commenter wrote: "As a retired US government employee who specialized in asylum and  
 9 refugee law, I am appalled by the government's position and embarrassed by the government attorneys  
 10 [sic] lack of reality." An image of these comments is appended to **Exhibit B**.

12    9. Attached as **Exhibit C** is a copy of the article published on November 6, 2025: John Woodrow  
 13 Cox, *ICE Indefinitely Holds Man Facing No Charges in High-Stakes Asylum Case*, Wash. Post (Nov. 6,  
 14 2025), <https://www.washingtonpost.com/investigations/2025/11/06/ice-indefinitely-holds-man-facing-no-charges-high-stakes-asylum-case/>.

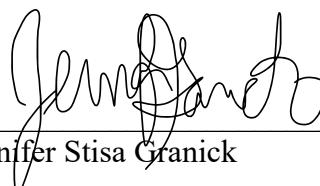
17    10. As Doe explains in his declaration at paragraph 7, Doe found the official Department of  
 18 Homeland Security ("DHS") email address for DHS attorney Joseph Dernbach through a brief Internet  
 19 search using Google. Attached to this declaration as **Exhibit D** is a true and correct copy of the top  
 20 results of a Google search for "Joseph Dernbach." The first result is a link to Dernbach's LinkedIn  
 21 profile. The second result is a link to Dernbach's "Member Profile" on the website of the Florida Bar  
 22 showing his status as an attorney admitted to practice in Florida.

24    11. Attached as **Exhibit E** is a true and correct copy of Dernbach's profile on the Florida Bar  
 25 website described above. The page includes Dernbach's official DHS email address, mailing address,  
 26 and phone number.

27    12. I have communicated with Google and its counsel in this matter. On December 8, 2025, Google  
 28 confirmed that it had not yet produced any records to DHS in response to the Subpoena. Counsel for  
 DECLARATION OF JENNIFER STISA GRANICK IN SUPPORT OF MOTION TO QUASH ADMINISTRATIVE  
 SUBPOENA

1 Google has further represented that Google does not intend to comply with the subpoena before a  
2 judicial ruling in this matter, but that, in the absence of a court order directing noncompliance, Google  
3 reserves the right to comply.

4 13. I declare under penalty of perjury that the foregoing is true and correct.  
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6 Executed this 2nd day of February 2026 in San Francisco, California.

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9 Jennifer Stisa Granick  
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