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*Attorneys for Movant Jon Doe*

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

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

JON DOE,

Movant,

v.

THE UNITED STATES DEPARTMENT OF  
 HOMELAND SECURITY,

Respondent.

Misc. Case No.:

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

Date: To be set by the Court  
 Time: To be set by the Court  
 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

10 3. To protect Doe’s anonymity, counsel in this action will file a true and correct copy of the  
11 pseudonymous declaration of Doe as an attachment to the Motion to Quash Administrative Subpoena.  
12 The Doe Declaration attaches the subpoena to Google as Exhibit E. The only difference between that  
13 exhibit and the subpoena as provided by Google is that Doe’s email address (which contains his real  
14 name) is redacted. The other redactions to the subpoena were present on the version provided to Doe by  
15 Google.  
16

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

21 5. Attached to this declaration are true and correct copies of the three Washington Post articles  
22 about the government’s attempt to deport the Afghan asylum-seeker “H”.  
23

24 6. Attached as **Exhibit A** is a copy of the article published on October 14, 2025: John Woodrow  
25 Cox, *He Supported the U.S. War in Afghanistan. Now He May Be Deported to the Taliban*, Wash. Post  
26 (Oct. 14, 2025), [https://www.washingtonpost.com/investigations/2025/10/14/trump-immigration-](https://www.washingtonpost.com/investigations/2025/10/14/trump-immigration-afghanistan-asylum-deportation/)  
27 [afghanistan-asylum-deportation/](https://www.washingtonpost.com/investigations/2025/10/14/trump-immigration-afghanistan-asylum-deportation/).  
28

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

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

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

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

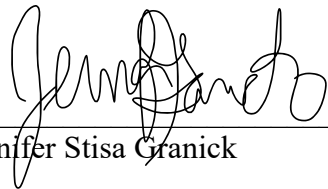
11. Attached as **Exhibit E** is a true and correct copy of Dernbach's profile on the Florida Bar website described above. The page includes Dernbach's official DHS email address, mailing address, and phone number.

12. I have communicated with Google and its counsel in this matter. On December 8, 2025, Google confirmed that it had not yet produced any records to DHS in response to the Subpoena. Counsel for

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.

5  
6 Executed this 2nd day of February 2026 in San Francisco, California.

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10 Jennifer Stisa Granick