

SECOND SUPPLEMENTAL DECLARATION OF NAVDEEP

I, Navdeep, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. My name is Navdeep. I am currently detained at the El Paso Service Processing Center, an immigration detention center in El Paso, Texas. Prior to being transferred to the El Paso Processing Center, I was detained at Camp East Montana, another immigration detention center in El Paso, Texas. I was transferred to the El Paso Service Processing Center from Camp East Montana on or around June 28, 2026.
2. Through June 2026, the food continued to be very bad at Camp East Montana. For four days of the week out of seven, it was hard to force myself to eat the food because it was so bad. For example, the scrambled eggs came in a container filled with water. A third of the container was filled with water. Often, the food seemed uncooked or severely undercooked.
3. Sometime around June 2026, I was moved from the Alpha Unit to the Bravo Unit where the toilets did not flush consistently. I had to keep pressing the buttons over and over to try to get them to flush.
4. In June 2026, the facility reduced our yard time to approximately 3 days a week for approximately 40 minutes each time. A guard said there weren't enough guards to watch us, so our yard time was limited as a result. Even when we were allowed to have recreation, it took place in a covered area where I could not see the sky above me or the sun. The yard was a cramped cage where it was not feasible to even take a walk or anything. The cage we were taken to from the Bravo Unit was even smaller than the one we were taken to when we were in the Alpha Unit. Because it's not really possible to do much during yard time in that small cage, I and others would just sit down in a square formation with our backs against the cage. We had nothing to do.
5. Around this same time, the facility stopped cleaning the unit. Cleaning would sometimes occur on Mondays, but the facility stopped those Monday cleanings. This made the unit very dirty.
6. In addition around that time, I believe barbers used to be compensated with either food or credits, but I believe the facility stopped offering those incentives, so the barbers stopped working. The only place to trim your nails at Camp East Montana was at the barbershop. Without access to the barbershop, I could not trim my nails. This did not feel good and it did not feel hygienic. Some people started using their teeth to chew and trim their nails, but I didn't want to do that. However, I did not feel good having such long nails without knowing when I might be able to trim them.
7. There was limited access to the law library at Camp East Montana. I kept trying to sign up to go to the law library in June 2026, but I was only able to go one time and it was for less than one hour. Access to the law library was very inconsistent. Even at the law

library, there was no access to the internet, books, or anything that would actually help us prepare our cases. We were mostly just able to look up our court date.

8. I worry for the people still detained at Camp East Montana. The conditions were awful through the end of my time there, which was around the end of June 2026. Even though I am now at a different detention center, I remain committed to this case. Based on my experience at Camp East Montana, the situation requires urgent attention to stop and prevent harm to people detained there.

Everything in this supplemental declaration is true and correct to the best of my knowledge and recollection.

Executed on the 8th of October 2026 in El Paso, Texas.

Signature: Nawdeep.