

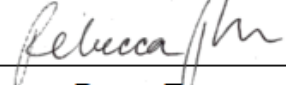
DECLARATION OF REBECCA PRESS

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

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am the Co-Executive Director of CoCounsel NYC, a non-profit law firm that provides free legal services to non-citizens in removal proceedings.
3. I am an attorney in good standing in the state of New York I am admitted in the Southern District of New York, Eastern District of New York, and the Second Circuit Court of Appeals. I specialize in the practice of immigration law.
4. I represent Ibrahima Barry in his immigration proceedings.
5. Upon information and belief, Ibrahima Barry was taken into custody and detained by Immigration and Customs Enforcement (“ICE”) at 26 Federal Plaza, New York, NY, on July 3, 2025. He was held at Federal Plaza for one night. He was transferred to criminal custody in Nassau County on July 4, 2025. He was returned to Federal Plaza on July 7, 2025, where he was held until July 11th, when he was transferred to Delaney Hall, New Jersey. My understanding of the timeline comes directly from Mr. Barry.
6. I became aware of Mr. Barry’s detention on July 8, 2025. I tried to contact him on July 9, 2025. Mr. Barry had several legal remedies available to him, including seeking release on bond. I also worried that Mr. Barry was being held in dangerous, inhumane conditions, and I wanted to try to provide him with as much relief from those conditions as I could, and to do so as quickly as possible.
7. Generally, when I need to locate and contact a client detained by ICE, I can enter that client’s information into the ICE online detainee locator system (<https://locator.ice.gov/odls/#/search>), which lists the facility where that client is detained. Clicking on the detention center in the locator leads to information about how to set up a call with the client.
8. The online detainee locator system did not give this information for Mr. Barry. Instead, it simply listed his location as “CALL FIELD OFFICE.” When I clicked on the location, it provided the address “26 Federal Plaza” and the phone number (212) 436-9315 or via email at nyceroattorneyinquiries@ice.dhs.gov.
9. I emailed the provided address on July 9, 2025, and was told “Your client is currently in transit to their final detention housing.” I responded, asking if he was currently at Federal Plaza and where he was being sent. Presumably he was being sent to a destination if he was, in fact, “in transit.” I did not receive a response.

10. On July 11, 2025, Mr. Barry was transferred from 26 Federal Plaza to Delaney Hall in New Jersey. Since this transfer, I have spoken confidentially with Mr. Barry repeatedly, once via phone, and three times via zoom.
11. Once we spoke, Mr. Barry described the conditions at 26 Federal Plaza to me, which he described as “awful.” He was held for 5 days. He was held in a small room with approximately 50 other men and there was significant overcrowding. They slept on the floor or while sitting upright because space was so tight. The room was windowless, and the door remained closed at all times. The room was terribly hot and smelled bad. There was one toilet in the same room for all men to share. They were not provided with a change of clothes. They could not bathe. They could not brush their teeth. They were provided with inadequate food, fed at most twice a day.

Executed on 1st day of August, 2025, at Brooklyn, NY

/s/ 
Rebecca Press, Esq.