

DECLARATION OF KARLA OSTOLAZA, ESQ.

I, Karla Ostolaza, 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 Managing Director of the Immigration Practice at The Bronx Defenders.
3. I am an attorney in good standing in the state of New York. I am admitted to practice law in the State of New York (Appellate Division, Second Judicial Department), the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second Circuit. I specialize in the practice of immigration law.
4. Our office represents detained New Yorkers in removal proceedings and regularly reaches out to people who may be eligible for our *pro bono* legal services. To my knowledge, no one in our office has been able to reach current or prospective clients detained at 26 Federal Plaza.
5. I provide this declaration to outline my efforts to reach two prospective clients detained at 26 Federal Plaza.
6. Generally, when I need to locate and contact a client detained by Immigration and Customs Enforcement (“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.
7. The online detainee locator system did not give this information for the two prospective clients I was trying to reach. Instead, it simply listed their 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. I checked the online detainee locator for both of them on July 24, 2025, around 11am.
8. When I called (212) 436-9315, I was not able to set up an attorney call. I called this number on July 24th, around 12:30pm. The person who answered my call said they do not schedule legal calls because they are a holding facility, not a detention center. She said I would have to wait until the people I was trying to reach were transferred to a detention center. I noted that some people are at 26 Federal Plaza for up to 20 days and ask whether even in those cases I had to wait until the person was transferred to secure a legal call. She said “yes, unfortunately.”
9. I insisted that it was important for me to be able to set up legal calls with the two prospective clients as soon as possible. She took down my information and the A

numbers of the people I was trying to reach and said she would pass my information to them so they could give me a call, but that she could not promise I would receive a call. I did not receive a call back from either person.

10. I also requested a legal call for one of the prospective clients via email. I sent my request to NYCEROAttorneyInquiries@ice.dhs.gov on July 24th, around 11am. I followed up around 2:45pm after electronically filing a G-28, Notice of Entry of Appearance, and then again around 4pm when I sent a copy of the form as an attachment. No one reached out to set up a call. Five days later, on July 29th, I received a reply to my request for a legal call directing me to email my request to NewOrleans.Outreach@ice.dhs.gov.

Executed this 8th day of August 2025.

A handwritten signature in blue ink, appearing to read 'K. Ostolaza', with a stylized, flowing script.

Karla Ostolaza, Esq.