

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
GRACE, <i>et al.</i> ;)	
)	
<i>Plaintiffs,</i>)	
v.)	Civil Action No. 1:18-cv-01853-EGS
JEFFERSON BEAUREGARD)	
SESSIONS III, in his official capacity as)	
Attorney General of the United States, <i>et</i>)	
<i>al.</i> ;)	
)	
<i>Defendants.</i>)	
)	
)	

DECLARATION OF CARMEN*

*Declarant is referred to as Carmen, pursuant to the Court’s order granting Plaintiffs leave to proceed under pseudonyms. Memo. and Order, Aug. 7, 2018, ECF No. 2.

I, Carmen, make the following declaration based on my personal knowledge, and if called to testify, I would testify as follows:

1. In the early morning of August 9, 2018, around 3:00 a.m., officials from the detention center in Dilley, Texas unexpectedly woke me up. At first, I was unsure what was happening.
2. I explained to the officials that I was not supposed to be deported that day because I was appealing my case. The officials told me they did not know anything about that.
3. Officials told me to wake my young daughter up, and gave me approximately 20 minutes to pack up my belongings. At approximately 3:30 a.m., they took me and my daughter to a separate area of the detention center, where we had come through when we first arrived. We waited there for a while.
4. At around 5:30 or 6:00 a.m., officials came to take us to the San Antonio airport. We arrived at the airport at about 7:40 a.m. We were asked to take off our shoes, and the officials confirmed my personal information and that of my child.
5. When we got on the plane, I recognized two other passengers: another woman from the detention center, and her child, who had come with us that morning. Additionally, there

were several other men who appeared to be immigrants. At least some of them were in shackles. The rest of the people onboard appeared to be Immigration and Customs Enforcement (“ICE”) officers. I could not tell if this was a government plane or a commercial plane. I did not have time to read what was on the side of the plane, because we were hurried on board.

6. At some point, the plane landed, and other immigrant men and women boarded the plane.
7. I was very sad and scared when I thought I had to return to my country because of the dire consequences waiting for us. I spent the entire plane ride to my home country worried about what would happen to my daughter and me once we landed.
8. While we were in the air, no one told me anything about what was happening. It was not until we landed in my home country that an official asked me my name and whether I was appealing my case. I said my name, and told him that I was appealing my case. The official told me that his boss had told him that I was going to be returned to the U.S.
9. When he told me that I could return to the United States, I was so happy – to keep fighting for my case and for my daughter.
10. I remained on the plane while others deplaned. Eventually, the plane took off and returned to the United States.

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I, Carmen, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge and recollection. This declaration was read back to me in Spanish, a language in which I am fluent.



SIGNATURE OF DECLARANT

13-8-18

DATE

I, Celso Perez, certify that I am proficient in both Spanish and English. I read the declaration above in its entirety to Carmen in Spanish.



SIGNATURE

8/13/2018

DATE