

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

USAMA JAMIL HAMAMA, et al.,
Petitioners/Plaintiffs,

v.

REBECCA ADDUCCI, et al.,
Respondents/Defendants.

Case No. 2:17-cv-11910
Hon. Mark A. Goldsmith
Mag. David R. Grand

Class Action

FIFTH DECLARATION OF MARGO SCHLANGER

I, Margo Schlanger, hereby make this declaration based upon my own personal knowledge; if called to testify, I could and would do so competently as follows:

Qualifications and Sources of Information

1. My qualifications and background are fully set out in my first declaration in this case, dated November 6, 2017, ECF 138-2, PgID3402 ¶¶2-4. As it says, I am the Wade H. and Dores M. McCree Collegiate Professor of Law at the University of Michigan Law School, and counsel for all Petitioners/Plaintiffs. I have since been designated class counsel, as well. ECF 191, PgID5360 ¶1(d).

2. This declaration is based primarily on: the Respondents' court-ordered disclosures; the Respondents' answers to Petitioners' discovery requests (both interrogatories and requests for production); the Department of Justice Executive Office for Immigration Review (EOIR) 1-800 immigration case hotline; and the U.S. Immigration and Customs Enforcement (ICE) online detainee lookup system. All sources are referenced where used. Responses to Petitioners' requests for production of documents are referred to by the Bates Stamp numbers assigned by Respondents. ICE's responses are denoted ICE-[number]; DHS's responses are denoted DSHamama[number].

3. By this Court's order, Respondents were required to respond to Petitioners' most recent discovery requests, "including production of documents," by August 20, 2018. ECF 366. On that date, however, Respondents did not produce any of the requested documents and declined to answer all but one interrogatory. They have not produced any additional documents in the days since. In addition, they have not updated the prior interrogatory responses since service of those responses on March 23, 2018.

4. Under this Court's orders, Respondents disclose information on class member detention location and immigration case progress every two weeks. The most recent disclosure was due August 22, and was provided partially on August 22 and August 23. ICE detention location data was disclosed August 23, and covers individuals in detention as of August 20. EOIR case procedure information was disclosed August 22 and is as of that date. Any stipulations to lift the stay of removal for a class member that occurred on or after August 27 are not included in this declaration. There is one class member, TJ, AXXX-XXX-230, whose detention status is unclear. He is not listed in ICE's detention disclosure, and his information is not available using ICE's online detainee locator. Respondents' counsel reports that ICE will check, but believes he is, in fact, in detention. I have omitted him below because I am not sure if (or where) he is detained.

5. Except when otherwise noted, this declaration is based on information about the (uncertified) primary class, which includes all Iraqi nationals in the United States who had final orders of removal at any point between March 1, 2017 and June 24, 2017 and who have been, or will be, detained for removal by U.S. Immigration and Customs Enforcement. ECF 191, PgID5347-48. When I refer to the *Zadvydas* subclass, I am using the definition certified by this Court: "All Primary Class Members, who are currently or will be detained in ICE custody, and who do not have an open individual habeas petition seeking release from detention." ECF 191, PgID5348. Based on monitoring of PACER entries using the names of class members, I am aware of nine detained members of the primary class who are not members of the subclass because they have open individual habeas petitions.

Arrests, the Timing of Detention, and Time Remaining

6. Discovery in this case reveals that Respondents started planning for a mass removal of Iraqi nationals in spring 2017, after eight removals by charter plane in April 2017. [REDACTED]

[REDACTED] Ex. 1-17, ICE-0269197. (Other Iraqis were apparently in detention at that time, as well.) [REDACTED]

Ex.1-15, ICE-0270940.

7. The weekend of June 11, 2017, ICE conducted mass arrests; about 100 class members entered detention that weekend, mostly arrested by ICE’s Detroit field office. Over the next weeks, many more class members were detained, and by August 21, 2017, there were over 290 class members detained. New detentions then slowed; only about 40 class members have been newly detained since August 21. All told, there are about 340 class members who have been detained in the course of this litigation.

8. Since June 11, 2017, most of the class members have gotten out of detention. At least 152 have been released on bond, nearly all as a result of this Court’s prolonged detention order dated January 2, ECF 191. At least 24 more have been released because they won their immigration cases. 17 were removed after individually waiving this Court’s stay of removal.¹ One was removed in violation of this Court’s order. ECF 371. At least 14 were released by ICE without immigration court involvement, 11 on orders of supervision or under formal alternatives to detention requirements.

Ex. 1-57, ICE-0295998.) One or two of the non-immigration court releases were for medical reasons.

9. If the Court of Appeals were to reverse this Court’s January 2 preliminary injunction, many of the class members released on bond would be subject to re-detention under 8 U.S.C. § 1226(c). In a prior declaration, I set out the available information about how many class members with open immigration cases are considered by ICE to meet the criteria in §1226(c), and estimated that “approximately 90% of the class member detainees who remain in detention after their MTRs are granted but before resolution of their cases are being held under the

¹ In addition, this Court approved one individual’s waiver of the stay of removal, ECF 85, even before entering the July 24 preliminary injunction.

purported authority of 8 U.S.C. § 1226(c).” ECF 174-3, PgID4917. That estimate addressed the class members *then* in detention, including those who later got out on bond based on this Court’s order.

10. There are 110 *Zadvydas* subclass members remaining in detention as of August 20. See Table A for their time in detention. Column a in Table A and also in Table B (below) includes all subclass members; column b is the subset who are currently not covered by this Court’s stay of removal, because they have waived its protection.² (That is, the numbers in column a include all those in column b.) I picked October 1, 2018 as the cutoff date in Table A, row 4 because that is approximately when Petitioners’ motion will be fully briefed, barring extensions. See L.R. 7.1(e). As the Table shows, by that date (assuming nobody is released or removed) there will be 106 *Zadvydas* subclass members whose detention has reached six months in duration. Only 4 subclass members will have been detained less than 6 months.

Table A: Class Members’ Detained Dates

	a. All <i>Zadvydas</i> subclass members	b. Prompt Removal Stipulation Entered
1. Before June 11, 2017	38	6
2. June 11 to Aug. 30, 2017 (over 1 year in detention, as of 9/1/2018)	51	5
3. Sept. 1, 2017 to Feb. 28, 2018 (over 6 months in detention, as of 9/1/2018)	9	3
4. March 1, 2018 to March 31, 2018 (will hit 6 months or more by 10/1/2018)	8	0
5. 5/1/2018 to present	4	0
TOTAL	110	14

Detention Authority and Bond

11. The posture of the *Zadvydas* subclass members’ cases varies. Table B sets out the data. The first set of rows, labeled 1 and 1.a through 1.d, sets out the bond results for the subclass members. The second and third sets of rows—labeled 2 and

² I omit subclass member Wisam Ibrahim from the stipulation tally, since his prior attempted waiver is contested. See ECF 356.

2.a through 2.d and 3 and 3.a through 3.d—divide the subclass by detention authority.³

Table B: Class Member Procedural Posture

	a. All <i>Zadvydas</i> subclass members	b. Prompt Removal Stipulation Entered
1. TOTAL	110	14
a. Ineligible for <i>Hamama</i> bond hearing ⁴	8	6
b. No bond hearing/result yet	16	
c. Bond denied	79	8
d. Bond granted but still in detention ⁵	7	
2. Post-Order (§1231) Total	55	14
a. Still time to file an MTR under ECF 87, or MTR in adjudication	17	
b. Time to file MTR has expired, ⁶ or lost MTR, or inapplicable due to stipulation	22	10
c. Reopened, but then lost on the merits or	17	4

³ Note: whether 1231 or 1226 applies in particular procedural postures is a complex question and the frequent subject of dispute. The chart is based on my understanding of what ICE considers the applicable detention authority under Sixth Circuit law. The one exception to that is for cases that are fully adjudicated in the BIA. Under *Bejjani v. INS*, 271 F.3d 670, 689 (6th Cir. 2001), abrogated on other grounds by *Fernandez-Vargas v. Gonzales*, 548 U.S. 30 (2006), 8 U.S.C. §1226, not §1231, is the detention authority for individuals who have lost on the merits in the BIA, filed a petition for review (PFR) in the court of appeals, and obtained a stay of removal. PFR case documents are largely unavailable using PACER, so I do not have reliable information about them. Accordingly, just for purposes of this chart, I classify cases as “post-order” once the merits are fully adjudicated in the BIA, without regard to PFR litigation.

⁴ One subclass member is ineligible for bond because he is classified by ICE as an “arriving alien” and is therefore not covered by the language of the Court’s detention preliminary injunction, see ECF 265. The others have had stipulations entered lifting the stay of removal. See ECF 203, PgID5459. (Wisam Ibrahim is tallied in column a but *not* in column b because the stipulation he agreed to has prevented his bond hearing, but that stipulation is currently contested. ECF 356.)

⁵ One of these individuals was redetained in circumstances not yet clear to me; the others were apparently unable to post bond.

⁶ Some of these individuals may have good cause for delay in their motions to reopen; in any event, it remains available to them to file such a motion.

	a. All <i>Zadvydas</i> subclass members	b. Prompt Removal Stipulation Entered
waived the merits challenge.		
3. Pre-Order (§1225 and §1226) Total	55	0
a. Won merits before IJ, pending appeal	2	
b. Lost merits before IJ, pending BIA appeal	23	
c. Merits pending before IJ	30	

12. As Table B shows, the class members in detention are currently evenly split between pre-order and post-order postures. Nearly all of them began detention post-order, but then those who won their motions to reopen shifted to pre-order detention. Some of that group then shifted back to post-order detention when they gave up or lost their cases (row 2.c). Those who remain pre-order have either won or lost before the immigration judge (IJ) and appeal is pending, or their case is still pending before an IJ. (Those who won final relief/protection in their cases are no longer in detention.)

13. Given the variation in posture, it’s hard to know how long the open cases will take to resolve. Different immigration courts are deciding these cases at different speeds. But based on the EOIR disclosures for the subclass, we do know that the Board of Immigration Appeals (BIA) has taken between two months and a year to decide motions to reopen for the current detainees (who, as detainees, are supposed to receive speedier BIA adjudication), with an average of about 6 months. The BIA has taken between 4 months and a year on appeals of IJ denials of MTRs. And the cases *pending* in the BIA on appeal from MTR denials have been there up to 8 months already. Merits cases can be expected to take longer—it takes time for the merits record to be transferred to the BIA, for example. A detainee who loses his IJ motion to reopen, wins a BIA appeal, loses his merits case on remand, and takes another BIA appeal, can expect that administrative adjudication to take well over a year *after* the immigration judge denies the motion. I set out more information on MTR adjudication time in my declaration dated November 6, filed in this case as ECF 138-2, ¶¶25-27, PgID3407-3408; and Petitioners summarized information on estimated time for adjudication in their motion for a preliminary injunction on detention issues, ECF 138, PgID3373-3375.

Detention Locations and Conditions

14. As of ICE’s August 23, 2018 detention location disclosure, the 110 *Zadvydas* subclass members were incarcerated in 33 different detention facilities. Each detention facility that houses more than 2 subclass members is set out in its own row of Table C, and the others are summed in the last two rows.

Table C: *Zadvydas* Subclass Detention Locations

Facility	Number
Calhoun Co* (Battle Creek, MI)	29
Northeast Oh. Correct. (Youngstown, OH)	16
Chippewa Co. Jail* (Sault Ste. Marie, MI)	6
Farmville Detention Center (Farmville, VA)	5
Lasalle ICE Processing Center (Jena, LA)	5
St. Clair Co. Jail* (Port Huron, MI)	5
Denver Contract Det. Fac. (Aurora, CO)	4
Pine Prairie ICE Processing Center (Pine Prairie, LA)	4
Houston Contract Detention Fac. (Houston, TX)	3
Otay Mesa Detention Center* (San Diego, CA)	3
York Co.* (York, PA)	3
Other—7 immigration detention facilities	9
Other—15 jails*	18

* Facility is a jail that also houses criminal defendants and/or convicts.

15. In Table C, an asterisk (*) marks the facilities that are jails, rather than specialized immigration detention centers. All told, most of the subclass member detainees—64 of the 110—are held in jails. The largest number are in the Calhoun County jail, where they are housed alongside pretrial criminal detainees and sentenced prisoners.

May and early June 2017 Travel Documents Requests

16. I have analyzed the data provided by Respondents r [REDACTED]. The data is from Ex. 6, ICE’s response to Petitioner Hamama’s Interrogatories 6 and 7 (“Interrogatory 6/7 Response”) and includes the names and A-numbers of each of the individuals covered by this phase of ICE’s deportation efforts, and the date(s) [REDACTED]:

- [REDACTED] Ex. 1-15, ICE-0269197.
- [REDACTED]” *Id.*

[REDACTED]

24. My analysis, explained in paragraphs ¶¶25-29 shows that up until [REDACTED]
[REDACTED]
[REDACTED].

25. Early in this litigation, pursuant to Court order, see ECF 87, PgID2356, ICE disclosed the detention histories from March 6, 2017 to July 28, 2017 for class members still in detention as of July 28, 2017. (Respondents did not disclose a list of absolutely all the arrests made in June; the disclosure was limited to those still in detention as of July 28.) [REDACTED]
[REDACTED]
[REDACTED].

26. Petitioners filed this lawsuit on June 15, 2017, seeking to represent a class of “all Iraqi nationals within the jurisdiction of the Detroit ICE Field Office, with final orders of removal, who have been, or will be, arrested and detained by ICE as a result of Iraq’s recent decision to issue travel documents to facilitate U.S. removals.” ECF 1, PgID20. On June 22, 2017, at 6:37 p.m., the Court agreed to the requested temporary restraining order blocking deportation of Iraqi nationals “within the jurisdiction of the Detroit ICE Field Office. . . , including those detained in Michigan and transferred outside of Michigan to other detention locations.” ECF 32, PgID502. (I know the time of the order because it was electronically distributed to counsel.)

27. On June 26, 2017, at 8:57 p.m. (again, I know the time because of electronic distribution from the court), the Court expanded the temporary restraining order to cover a nationwide class: “all Iraqi nationals in the United States with final orders of removal, who have been, or will be, arrested and detained by ICE as a result of Iraq’s recent decision to issue travel documents to facilitate U.S. removal.” ECF 43, PgID676.

28. Thus up until the night of June 26, ICE’s ability to deport Iraqis *not* “within the jurisdiction of the Detroit ICE Field Office” was unconstrained by this litigation. ICE’s Detroit Field Office has jurisdiction over all of Michigan and Ohio; ICE refers to this area as the Detroit Area of Responsibility or AOR. See <https://www.ice.gov/contact/ero>. In order to see how many Iraqi nationals whom ICE had in custody at that time (and hence available to be removed) were outside the Detroit Field Office’s jurisdiction, I cross-referenced the arrested individuals and their disclosed detention records. I flagged each individual who had been detained prior to June 26 for any period of time in either Ohio or Michigan. Individuals who were *not* detained in Ohio or Michigan were not covered by the first temporary restraining order, and remained amenable to deportation—if Iraq had provided travel documents and permission for ICE’s hoped-for charter flight.

29. Of the 274 individuals listed as covered [REDACTED]

[REDACTED]

30. According to ICE’s Interrogatory 6/7 Response, on June 20, 2017, [REDACTED]

[REDACTED]

Other Consular Interviews and Travel Document Grants and Denials

31. After the three [REDACTED]

[REDACTED] spelled out in ICE’s Interrogatory 6/7 Response, and are summarized in Table D.

32. As Table D shows, f [REDACTED]

[REDACTED]

t [REDACTED]

33. All told, Table D shows ICE [REDACTED]

34. As the table shows in the rows [REDACTED]

Table D: Travel Document Requests and Responses

a. Request date	b. # of requests	c. # Approved, NON-Volunteer (Date)	d. # Approved, Volunteer (Date)	e. # Declined: Reason (Date)	f. # Other: No outcome (Date)
[REDACTED]	1	1	[REDACTED]	[REDACTED]	
[REDACTED]	1	1	[REDACTED]	[REDACTED]	
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	1	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL*	8	8	8	8	4

* The total is not a sum of the rows because it eliminates multiple submissions for the same individuals.

35. After this court's entry on July 24, 2017 of the preliminary injunction staying removal, and pr [REDACTED] [REDACTED] for detainees who had expressed some desire to waive the protection of this Court's stay of removal. In some of these cases, once these detainees discussed their situations with counsel, pursuant to this Court's order, ECF 110, it became clear that they had not understood the issues or they changed their mind. Therefore no "prompt removal" stipulation was submitted to the Court and the stay of removal remained in place.

36. Beginning with t [REDACTED] [REDACTED], ICE's Interrogatory 6/7 Response demonstrates t [REDACTED]

[REDACTED]

37. As far as can be ascertained from ICE's disclosures, a [REDACTED]

[REDACTED]

38. Most recently, Iraqi officials have conducted three rounds of interviews; these are tallied in Table E. On May 23, 2018, Iraqi consular officials conducted 33 interviews of class members at the Stewart Detention Center in Lumpkin, Georgia. (According to a declaration by James Maddox, ECF 311-3, Iraqi officials conducted a total of 42 consular interviews. Some were of non-class members.) [REDACTED] these most recent interviews included numerous individuals who were not amenable to deportation under this Court's stay of removal; five with pending motions to reopen, and seven whose motions to reopen were not yet due. S [REDACTED]

[REDACTED]

Table E: Consular Interviews Since May 2018

a. # of interviews (Location, Date)	b. # Approved, NON-“Volunteer” (Date)	c. # Approved, “Volunteer”* (Date)	d. # Declined: Reason (Date)	e. # Other: Outcome (Date)
33 Stewart, 5/23/2018	4 (7/10/2018)	26 (6/8/2018)	2: Embassy stated they are not Iraqi (6/8/2018)	1: More info. requested (6/8/2018)
[REDACTED]				[REDACTED]
[REDACTED]				[REDACTED]
TOTAL	4	26	2	[REDACTED]

* The word “volunteer” in this column means only that the individual in question signed Iraq’s form that stated he was “return[ing] voluntarily” to Iraq. See Ex. 3 at Exhibits A-K for examples of the form. Petitioners have brought to the Court’s attention numerous examples of coercion inducing detainees to sign although they do *not* wish to return to Iraq, ECF 307, and the Court responded by instituting some helpful safeguards. ECF 370.

39. For [REDACTED] individuals who have participated in the three sets of consular interviews from May to [REDACTED] [REDACTED] According to an ICE declaration, on June 8, the Iraqi embassy issued one-way laissez-passers for 26 of them—all individuals interviewed on May 23, at Stewart, who signed the Iraqi form acquiescing to removal. The embassy denied two, requested more information for one, and sent six of the files—those for detainees who declined to sign the acquiescence form—to Iraq for consideration by the Ministry of Foreign Affairs. Maddox Dec., ECF 311-3, PgID7480. Of those six detainees, four are subclass members.

40. [REDACTED]
[REDACTED]
[REDACTED] e:

- S [REDACTED] A [REDACTED], AXXX-XXX-798
- AO, AXXX-XXX-985 (non class member)
- RAA, AXXX-XXX- 968 (non class member)

- AK, AXXX-XXX-689
- ODD, AXXX-XXX-561
- KP, AXXX-XXX-207

The first three listed individuals are unprotected by this Court's stay of removal, and are therefore available to be deported whenever ICE is able to do so.⁷ Yet as of August 27, 2018, ICE's online detainee locator shows all still in detention.

[REDACTED]

41. ICE is required by ECF 316 to disclose any additional travel documents obtained for other class members. [REDACTED]

[REDACTED]

Removal difficulties unrelated to this Court's stay of removal.

42. There is a great deal of evidence that ICE faces tremendous obstacles to effectuating removals to Iraq, which cause long delays and often make removals impossible. These are wholly separate from this Court's stay of removal. As discussed above, ICE frequently cannot obtain travel documents. But even when it *does* obtain travel documents, the task of arranging flights is very challenging and may not, in the end, succeed. The succeeding paragraphs provide detail.

Non-class members

43. Respondents have not provided full information about Iraqi nationals who are not class members, and therefore not protected by this Court's stay of removal. But it is clear that ICE has been unable to remove at least some—and possibly all—such individuals who have not agreed to their own removal when interviewed by Iraqi officials.

44. The discovery in this case covers one such individual, [REDACTED]

[REDACTED]

⁷ This court lifted the stay of removal for Mr. A [REDACTED] under the prompt removal process. ECF 252.

⁸ There is also a great deal of information about Mr. AS available from an article published in *The Intercept*. See Ryan Devereaux, *An Iraqi Family Sought*

i [REDACTED]

Class members who waive the protection of the stay of removal

45. Respondents have asserted in declarations that ICE can promptly effect removal where there is no judicial limitation (i.e. for those who have requested removal and for whom the court has then lifted the stay). For example, on December 22, 2017, ICE official Michael Bernacke wrote in a declaration “ICE has also submitted 10 additional travel document requests for putative class members who have voluntarily opted out and is awaiting approval of travel documents for these individuals. ICE expects to receive travel documents for all requested individuals in the very near future.” ECF 184-2, PgID5073, ¶11.

46. My analysis of the length of time it takes for ICE to effectuate removal for class members who have waived the protection of the stay shows that they spend substantial time in detention even after the stay has lifted. ICE’s response to Hamama Interrogatories 6/7 has [REDACTED]

Asylum in the U.S., Thinking the Worst Was Over. Then Their American Nightmare Began, at <https://theintercept.com/2018/03/18/safaa-al-shakarchi-asylum-detention-ice/> (Mar. 18, 2018).

[REDACTED]

47. This Court has ordered a process by which individuals can waive the protection of the stay of removal. As of August 26, 2018, the Court has approved such waivers for 33; for 4 others, Petitioners stipulated to the lifting of the stay because the individuals had agreed that they were not seeking to further litigate their immigration cases class members.⁹ [REDACTED]

[REDACTED] Based on ICE's court-ordered disclosures, [REDACTED]

48. Of the 37 class members who have had the stay of removal lifted for them (in many cases, foregoing challenge to their removal orders), 20 remain in detention. For many, t [REDACTED] They have been waiting ever since the Court lifted the stay, some for as long as 8 months. Table F sets them out by name, with the date their stay was lifted, the docket number of the relevant order, and the days elapsed since then (as of August 26, 2018).

49. The very long length of time these individuals have waited, unable to get out of detention, cannot be attributed to the Court's stay of removal because Table F shows only time accrued after that stay was lifted.

⁹ This tally omits Wisam Ibrahim, whose attempted waiver is contested. *See* ECF 356. It also omits Hussein Alrudaini, whose stipulated order, ECF 85, was entered prior to the July 24 preliminary injunction and prior to the Court's approval of the general process, and who I understand possessed an unexpired Iraqi passport.

50. As Table F shows, it can take months for ICE to obtain travel documents even for willing repatriates, even after the stay has lifted. In addition, Table F demonstrates that even *after* travel documents are issued, difficulties can arise that can add months to a class member’s detention. See, e.g., Ex. 9, Declaration of Perla Gonzalez (describing clearance difficulties for class member Nouzat Hanna that are delaying his repatriation for at least two months); Ex. 4, Schultz Dep. at 46, 174-175 (describing commercial flight scheduling difficulties caused by “country clearances and then notification time periods and transiting issues”).

Table F: Class Members without A Stay of Removal

Name	Stay Lifted Date	ECF #	Travel document obtained date	Days since stay lifted.
Dhahir Al Salman	12/18/2017	181		251
Omar Al Talaqani	12/18/2017	182		251
Safaa Abdulaziz Al Maliki	2/16/2018	233		191
Aqil Al Muntafiji	3/7/2018	253		172
Sabeeh Abed Jasim Alsaad	3/7/2018	252		172
Muslem Al Rubaiai	4/13/2018	271		135
Saed Al Zamely	4/13/2018	270		135
Abdulrazaq Al Shimari	5/10/2018	283		108
Aziz Al Darraji	5/24/2018	291		94
Ahmad Mirza	5/31/2018	294		87
Wamidh Al Idani	6/6/2018	300		81
Hani Al Bazoni	6/8/2018	303		79
Jomaa Al Essa	6/14/2018	309		73
Sarkoun Ablahid	6/19/2018	314		68
Salar Omar Karim	7/10/2018	332		47
Mohammed Al Khafaji	7/19/2018	346		38
Revan Shawkat Mansoor	7/23/2018	349		34
Nouzat Hanna	7/30/2018	352		27
Khalid Al-Asakir	8/7/2018	361		19
Sarmad Israil	8/22/2018	369		4

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury under the laws of the United States that the above statements are true and correct to the best of my knowledge, information, and belief. Sworn in Washtenaw County, Michigan.

Date: August 28, 2018



Margo Schlanger