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Exhibit 13

**Declaration of
Ducesa B [REDACTED], A [REDACTED]**

I, Ducesa B [REDACTED], (A [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My name is Ducesa B [REDACTED]. My alien registration number is A [REDACTED]. I was born in Romania. My date of birth is [REDACTED]. I am 12 years old. I am currently detained at the South Texas Family Residential Center (the Dilley detention center) with my mother, Luminata B [REDACTED], A [REDACTED].
2. We entered the United States by crossing the river near Reynosa on November 18, 2017.
3. We were apprehended the same day and taken to a cell for about 15 hours. There were no hygiene products available for us in this cell. There was no soap to wash our hands, no toothbrushes or toothpaste. There was a toilet in the cell, right there in the room with us. A short wall went up halfway, meaning we had no privacy when we used it. We were not allowed to shower while we were in the cell.
4. It was very cold in this cell. We were each given a metallic blanket, but no mats. We had to sleep on the concrete floor. There were many of us in a very small space. I can't count how many there were. We were all sitting right next to each other, touching shoulder to shoulder.
5. We were given chips and sandwiches, along with water, while we were in this cell. We received only one meal during our time in the cell.
6. On November 19, we walked to another part of the same facility, where we spent three nights. We were not allowed to shower until November 20. We had no clean clothes until the day we were allowed to shower, when they gave my mother and me a change of clothing and washed and returned the clothes we had been wearing.
7. The food was awful. It made me nauseated. They would feed us burritos and bad sandwiches three times a day, at 6 a.m., 11 a.m., and 4 p.m. At the same time, they would give us chips, an apple, and a bottle of water. We received nothing to eat for fourteen hours per day (from 4 p.m. to 6 a.m.). I was so hungry because I could not eat the burritos and the sandwiches. I asked for snacks, but they refused to give me any.

8. This second facility had hundreds of people and it was very crowded. There were 30 to 40 children in the children's area, where I was. It was very cold. All the walls were metal fences, like a kennel for animals. We were not allowed to exercise or go outside. The lights were always on and we did not know what time it was. I could not sleep.
9. They separated me from my mother. She asked them not to separate us, but they ignored her. I would try to talk to my mom across the cells, but the guards would get mad at us. I let my mom know that I was getting sick, but there was nothing she could do.
10. I kept crying and felt very depressed. It was the worst experience of my life.

I, Ducesa B [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Romani, a language in which I am fluent, and was read back to me in Romani.

[REDACTED]

Ducesa B [REDACTED]

12/02/17

Date

Certificate of Translation

I, Michael Bochenek, certify that I read the above declaration to Ducesa B [REDACTED] in Italian, a language she understood, before she executed it. In addition, I translated the document into Romani using Google Translate and prior to executing the declaration Ducesa Briceag affirmed its accuracy. I further certify that I am proficient in Italian.

Michael Bochenek

Michael Bochenek

7 Dec 2017

Date

Exhibit 14

**Declaration of
Giovanni D [REDACTED], A [REDACTED]**

I, Giovanni D [REDACTED], (A [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My name is Giovanni D [REDACTED]. My alien registration number is A [REDACTED]. I was born in Romania. My date of birth is [REDACTED]. I am 13 years old. I am currently detained at the South Texas Family Residential Center (the Dilley detention center) with my mother, Aurelia D [REDACTED], A [REDACTED].
2. We entered the United States near Matamoros, across from Brownsville, Texas.
3. Prior to arriving at the Dilley Center, we were detained at another facility for approximately three days where there were no hygiene products. There was no soap, no water for washing our hands or face, no toothbrushes or toothpaste.
4. It was so cold that our teeth would hurt and our throats would hurt. We were given nothing but a plastic blanket to keep us warm.
5. My mother asked the guards to please turn down the air conditioner, but they refused.
6. They left the lights on all day and night. We lost track of day and night. We did not see sunlight for days and could not sleep.
7. They would not let me go outside or get any exercise. I asked to go outside, but the guards ignored me. They only let me watch television. It was very stressful to be locked up alone with my mother and not to be able to speak to anyone else or do anything but watch television.
8. They did not give me enough food. They gave me no breakfast, a frozen sandwich cut in triangles and chips for lunch. Most of the meals were a frozen sandwich and chips. All of the meals were cold except one. That meal was macaroni, which was served a little warm. I was so hungry I asked for snacks, which they gave me.

I, Giovanni D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Romani, a language in which I am fluent, and was read back to me in Romani.

[REDACTED]
Giovanni D. [REDACTED]

12-05-2017
Date

Certificate of Translation

I, Michael Bochenek, certify that I read the above declaration to Giovanni D [REDACTED] in Italian, a language he understood, before he executed it. In addition, I translated the document into Romani using Google Translate and prior to executing the declaration Giovanni D [REDACTED] affirmed its accuracy. I further certify that I am proficient in Italian.

Michael Bochenek

Michael Bochenek

5 Dec. 2017

Date

Exhibit 19

**Declaration of Karla T [REDACTED],
A [REDACTED]**

I, Karla T [REDACTED] (A [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection:

1. My name is Karla T [REDACTED]. My alien registration number is A [REDACTED]. I was born in [REDACTED] Guatemala. My date of birth is [REDACTED]. I am 15 years old. I am currently detained in the South Texas Family Residential Facility (the Dilley detention center), in Dilley, Texas, together with my mother, Lucia P [REDACTED], A [REDACTED]. My mother and I speak Q'eqchi'. I also speak and read Spanish.
2. We fled Guatemala because a group of men threatened to rape me unless my mother paid them money. We did not have any money and so we fled to the United States, where my brother and my uncle live.
3. My mother and I entered the United States on or about November 10, 2017, together with my niece, Elisa E [REDACTED] who is five years old. We crossed the river near Reynosa at night and looked for immigration authorities to present our claim for asylum, but we could not find any immigration authorities. We were afraid of accidentally returning to Mexico and so when we found a fountain, we decided to stay there for the night.
4. At 6 a.m., we woke up and started walking again. We saw three men who were immigration officials and tried to tell them why we were afraid to return to Guatemala.
5. They took us to the *hielera* for two days. It was very cold. They gave us a metal blanket and made us sleep on the floor. There were twenty people in the room where they kept us. There was no soap, no toothpaste, and no toothbrushes. During our entire time at the icebox, they never let us go outside or get any exercise.
6. On the second day we were at the *hielera*, they took my mother away from me and had her speak to someone on the phone, but they were speaking Spanish to her and my mother does not speak Spanish. I tried to go to her to translate for her, but they would not let me help my mom. They kept me away from her so she could not communicate our claim for asylum.

7. After we left the *hielera*, we were taken to another facility for two days. They separated me from my mother and put me in a room alone with about ten girls between the ages of five and 17 years of age, including my niece. My mother slept in a different room. I could not see my mother, but I could hear her through the ventilation ducts. I tried to speak to my mother through the grill, but the immigration official got mad at me and made me stop. I started to cry and the immigration official told me to go take care of my five-year-old niece. During our entire time at the second facility, they never let my niece or me go outside or get any exercise. There were no officials at the second facility who spoke Q'eqchi'.
8. Next we were taken to the Dilley detention center. We have been at the Dilley detention center for 23 days. At no point have we been provided a list of legal rights or service providers. We have not been given an interview with an attorney, asked to appear before a judge, or met with an ICE official for an interview. We just sit here and wait day after day without explanation. We have still not had the opportunity to present our claim for asylum.
9. There have been other Q'eqchi' speakers who have been released, but not us. My brother and my uncle are waiting for us, but we have been given no information for over three weeks.
10. During our time at the Dilley detention center, we have not been offered any treatment for the trauma we experienced in Guatemala.
11. I hope that the court will take our experiences into account and will make sure that other families do not have to go through what we have experienced.

I, Karla T [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

Karla T [REDACTED]

12 07 17
Date

Certificate of Translation

I, Michael Bochenek, certify that I am fluent in English and Spanish and that I read the above declaration to Karla T [REDACTED] in Spanish.



Michael Bochenek
Human Rights Watch
350 Fifth Avenue, 34th Floor
New York, NY 10118-3299



Date

Exhibit 20

Declaration of
Katherine G [REDACTED], A [REDACTED] [REDACTED]

I, Katherine G [REDACTED], (A [REDACTED] [REDACTED] [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My name is Katherine G [REDACTED]. My alien registration number is [REDACTED]. I was born in Honduras. My date of birth is [REDACTED]. I am 14 years old. I am currently detained at the South Texas Family Residential Center (the Dilley detention center) with my mother, Bessie L [REDACTED] A [REDACTED] [REDACTED] and my two younger brothers, Luis F [REDACTED] A [REDACTED] and Dixie Y [REDACTED] A [REDACTED] who are nine and eleven years of age, respectively.
2. We entered the United States near Calexico together as a family unit.
3. Prior to arriving at the Dilley Center, we were detained at another facility for three days where there were no hygiene products. There was no soap to wash our hands, no toothbrushes or toothpaste. We went the whole time without washing or bathing. We had no clean clothes.
4. It was very cold and we had to sleep on the cement floor. We were given nothing to keep us warm except one aluminum blanket.
5. We were not given clean water to drink. We had to drink water from the bathroom sink with our bare hands, which were dirty since we were not able to wash them after toileting because there was no soap.
6. We were fed three times a day, but were given no snacks, except for my little brothers, who were given crackers and juice a few times.
7. We were never allowed to go outside to play or get exercise. We had to stay inside the entire time. I was really becoming desperate from being locked up inside the whole time, without any chance to get outdoors and move around.
8. Even though the conditions are better here the Dilley detention center, I have been here for 22 days so far. My mother keeps telling me to stop chewing my nails. I have been biting them because I am so anxious from being locked up.

I, Katherine G [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

— [REDACTED]
Katherine G [REDACTED]

Date: December 7, 2017

Certificate of Translation

I, Michael Bochenek, certify that I am fluent in English and Spanish and that I read the above declaration to Katherine G [REDACTED] in Spanish.

Michael Bochenek

Michael Bochenek
Human Rights Watch
350 Fifth Avenue, 34th Floor
New York, NY 10118-3299

7 Dec 2017

Date

Exhibit 24

**Declaration of
Maybeline E [REDACTED] A [REDACTED]**

I, Maybeline E [REDACTED] A [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My name is Maybeline E [REDACTED] My alien registration number is A [REDACTED]. I was born in El Salvador. I am 13 years old. I am currently detained at the South Texas Family Residential Center (the Dilley detention center) with my mother, Marian P [REDACTED] A [REDACTED].
2. We entered the United States by crossing on November 18, 2017.
3. We were apprehended by immigration officials soon after entering. After we were apprehended, we were taken to a holding facility that is referred to the *hielera*—the freezer, for about 6 hours. The conditions were very crowded and the sanitation system was not working well, so we were transported to another holding facility known as the dog pen—*la perrera*.
4. At *la perrera*, I was separated from mother over our objections. I was very very worried and frightened because I was put with strangers. I could not sleep in part because a woman official kept screaming at detainees. The fact that the lights were kept on for 24-hours a day also made it impossible to sleep.
5. The food at *la perrera* was terrible. We were given a flour tortilla with rice and beans twice a day. Although there was lettuce, the lettuce was spoiled.
6. My mother and I were brought to Dilley on or about November 21, 2017. Although there is better food at Dilley, I am not happy here. I do not have the freedom to leave or to do many things I want to do. I also have no privacy.
7. At no time has anyone asked me or my mother whether I would like to be released to my father or older sister who live in the United States. My father lives in Arkansas and My 23-year old sister lives in New Jersey. Neither my mother nor I have been informed that that is an option.

I, Maybeline E [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in

which I am fluent, and was read back to me in Spanish.

[REDACTED]

[NAME]

12-7-17
Date

Certificate of Translation

I, Bill Ong Hing, certify that I am fluent in English and Spanish and that I read the above declaration to Maybeline B [REDACTED], in Spanish.

Bill Ong Hing
Bill Ong Hing
University of San Francisco School of Law
2199 Fulton Street
San Francisco, CA 94117

12-7-17
Date

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On January 12, 2018, I electronically filed the following document(s):

- [REDACTED] EXHIBITS IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' FIRST JUVENILE COORDINATOR REPORTS VOLUME 1 OF 2 [FILED UNDER SEAL PURSUANT TO ORDER OF THE) COURT DATED JANUARY 9, 2018]

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Peter Schey
Attorney for Plaintiffs

Exhibit 42

Declaration of

KATYA J [REDACTED] A NUMBER [REDACTED]

I, **Katya J [REDACTED]** (A number [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] and I am seventeen years old. I am here with my father. His name is Jose A [REDACTED] His date of birth is [REDACTED] My father and I are from El Salvador.
2. My father and I crossed the border between the United States and Mexico through the Rio Grande on December 6, 2017. We presented ourselves to customs and border protection agent. They asked us for our information and for our documents. They took our belongings, like our wallets and belts and put them in a bag. We have not gotten our belongings back but they gave us our documents. Next we got into a van and drove to a building. We spent about five minutes outside the building in a van and then drove about twenty minutes to arrive here at immigration where we are currently being held.
3. We arrived at the facility where we are currently being held in the night. We stood outside in the cold for about ten minutes while they took off our jackets and searched us. We went inside, and they took my father somewhere away from me. I felt horrible because I didn't know what was happening and I couldn't see my father. We've been together this whole journey so it was scary to be separated. No one explained why we were being separated. They took my photos and fingerprints. They didn't ask me anything about why I had come to this country or whether I was afraid to return to El Salvador. They put me in a big room, and I went to sleep. I spent the night separated from my father, which was very scary for me.
4. The next morning I woke up and took a shower and was able to brush my teeth. That was the only time I have been able to bathe. I ate some tortillas with rice and beans, an apple, some chips, juice and a water. They asked me whether I had come with my father and they took me to see him for about 15 minutes. It wasn't enough time – I was crying because I was scared to leave him again. I went back to the large room and we were fed again but I didn't eat because the food is always the same. The taco is the only warm food we get.
5. I am sitting here with my father right now, and this is only the second time that I have been able to see my father since I have been here. This has been really difficult for me. I would like to be able to stay with my father or at least spend more time with him during the day.

6. Since arriving at this facility, no one has given me information about my rights as a *Flores* class member. I have not received a list of attorneys. I have not had the opportunity to call an attorney or to call any family members. My father was not able to speak with a family member. But he had a phone call with an official who told him that his next step was to talk to a judge. He was not able to speak to an attorney before or after this call. We would like to be able to call our family members because we don't know if they know that we have arrived and we would like them to be able to buy us tickets to go stay with them. We have not been able to tell anyone that we are afraid to return to our country. We want to be able to tell our story because we are afraid to return.

I, Katya J [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

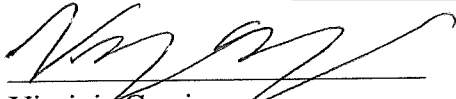
[REDACTED]
KATYA J [REDACTED]

12/8/17

Date

Certificate of Translation

I, Virginia Corrigan, certify that I am fluent in English and Spanish and that I read the above declaration to Katya J [REDACTED] in Spanish.



Virginia Corrigan

Youth Law Center
823 Folsom Street, Suite 700
San Francisco, CA 94017

12/8/17

Date

Exhibit 50

DECLARATION OF IRMA T [REDACTED]

A [REDACTED]

I, Irma T [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection:

1. My name is Irma T [REDACTED], A [REDACTED] I was born on [REDACTED] in [REDACTED] Guatemala. I speak Kiche and have been in the United States for 10 days. I arrived to the United States around November 29th, 2017, and crossed the border by wall at Reynosa.
2. After I crossed the border with another person, the officers came and grabbed us. They took us to a house and we spent four nights there. It had mattresses and sheets. There were about 20-25 people of everything - children, adults, and babies. We were all women. They fed us three times a day. It was always the same thing – Lay's, meat hamburger, apples, and bottles water. I didn't like it. In my country we don't that. In that place, they asked me a few questions like who did I come with and my father's number. We were enclosed there and couldn't leave. I didn't do anything during the days.
3. On Tuesday, December 5th, 2017, they took all of us to another center. There were no mattresses. Only aluminum blankets. It was cold and concrete. I was there for 2 hours. They called me in for questions. I told them I speak Kiche and they asked if I speak Spanish. I said yes and they said that they'll speak to me in Spanish. An older man asked me questions. He didn't believe me when I told him I was 17. He said I had 18 or 19 years. After a while, I think he believed me because he let me go with the other children.
4. They brought me to another center. I am in a room with I believe 20 girls of 17, 16 years. We are enclosed here. They just let us out to eat and use the bathroom. We pass our days sitting, doing nothing. I'm bored here.
5. The day I arrived, they told us that it was our turn to shower. We went in a group and there were about 10 bathrooms. I could shower and brush my teeth. I could watch tv while waiting. That was the only time I showered.
6. Here they feed us Lay's, hamburgers, apples and water. The same for breakfast, lunch, dinner, in the morning and the afternoon. I eat when they tell me to. There are cookies and juice but I hardly eat them.
7. They give us a sheet and small mattress in the night. No pillow. I can sleep.
8. We don't know what time it is here. They don't tell us. The lights are on all day long. One time, we thought it was the day but someone opened the door and it was night.
9. It was only on Wednesday that the consulate explained our rights, that we're going to leave from here and go to the Home House ("la casa de hogar") and there we can play ball, do everything we want, go to school, it's not like here and that I was able to call my

dad. They gave us a paper. No one else has given me anything and no one has spoken to me in Kiche since I have arrived.

10. I was told that I leave today at 2pm. I want to leave. We don't do anything, just sit on the mattress, doing nothing. I'm bored and want to leave.

I, IRMA T [REDACTED] DECLARE UNDER
PENALTY OF PERJURY THAT THE PRECEDING IS
TRUE AND CORRECT TO THE BEST OF MY
KNOWLEDGE AND RECOLLECTION.

[REDACTED]
Signature

12/8/2017

Date

I, Jillian Severinski, certify that I am fluent in English and Spanish
and that I read the above declaration to Irma T. [REDACTED]
in Spanish

Jillian Severinski
Jillian Severinski

12/8/17

Date

1305 N. Flores St.

San Antonio, TX 78212