IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

WILMER GARCIA RAMIREZ, et al., Plaintiffs, v. U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE), et al., Defendants.	)	Case No. 1:18-cv-00508-RC

Declaration of Allena Martin

I, Allena Martin, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am over 18 years old and competent to make this declaration.

2. This declaration is based on my personal knowledge and my review of government records produced in the above-captioned case.

3. I am a Senior Litigation Attorney at the National Immigrant Justice Center (NIJC). NIJC, along with the American Immigration Council (Council) and Professor Kate Melloy Goettel, University of Iowa College of Law, represents the Plaintiff class.

4. As discussed in the Second Supplemental Declaration of Suchita Mathur filed along with the instant motion, each month Plaintiffs' counsel receives a spreadsheet from Defendants with information about age-outs re-detained during the prior month, along with supporting records. *See* ECF 482-5, 2d Supp. Mathur Decl. ¶¶ 4-5.

5. I reviewed the August re-arrest spreadsheet that Defendants provided on September 21, 2026, and found that eleven age-outs were re-arrested in August who did not have a prior final order of removal, and that five out of the eleven had already been removed as of September 22,

2026. This includes one individual re-detained on August 24th and removed on September 1st through voluntary departure, another who was re-detained on August 11th and ordered removed on September 4th, and a third who was arrested on August 9th and granted voluntary departure by an immigration judge 10 days later.

6. I also reviewed the September re-arrest spreadsheet that Defendants provided on October 20, 2026. I found that out of eight age-outs who were re-arrested in September who did not have a prior final order of removal, six have already been removed or accepted voluntary departure as of October 24. This includes one individual who was re-detained on September 15th and granted voluntary departure on September 22nd, another who was re-detained on September 5th and ordered removed on September 24th, and a third re-detained on September 2nd and ordered removed on September 16th. Also of note, out of the six individuals already removed or in the process of being removed, four were re-detained based solely on technical violations of their reporting requirements, such as a missed ICE check-in or a failure to update their address.

7. After Plaintiffs filed their Second Motion to Enforce the Court's June 2, 2026 Order (ECF 482), Defendants' counsel informed Plaintiffs' counsel for the first time on October 26, 2026, that B.I.'s voluntary departure deadline is November 4, 2026—just 30 days from his grant of voluntary departure, even though 8 U.S.C. § 1229c(a)(2)(A) authorizes up to 120 days to voluntarily depart. *See also* ECF 486 at 2.

8. After communicating this information to B.I. and his brother, I learned that B.I. had heard from ICE officers at Moshannon Valley Processing Center that he was supposed to depart during the week of October 19 along with others returning to Uzbekistan, but that ICE "didn't let him leave."

9. On October 27, Plaintiffs' counsel asked Defendants' counsel whether ICE was

keeping him detained in the United States because of the instant motion.

10. The next day, October 28, B.I.'s brother conveyed to me that B.I. was concerned about both the impending voluntary departure deadline, and the risk that he could remain indefinitely detained if ICE did not facilitate his prompt departure.

11. The same day, having not received a substantive response from ICE, I again reached out and asked whether Defendants would agree to facilitate his departure this week if Plaintiffs withdrew his request for release, and expressed B.I.'s concern that he would not be able to depart from the country by the November 4 deadline that Defendants state exists.

12. On the evening of October 29, Defendants' counsel reported that B.I.'s "anticipated departure date" is scheduled by or before November 4, which Defendants' counsel understood to mean that B.I. is scheduled to be removed by or before November 4.

13. Given these representations, B.I. withdraws his request for release.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 29, 2026 in Silver Spring, MD

__/s/ *Allena Martin*_____
Allena Martin