

DECLARATION OF LORILEI WILLIAMS

I, Lorilei Williams, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

Introduction

1. I am a senior staff attorney for the Southeast Immigrant Freedom Initiative of the Southern Poverty Law Center . SIFI provides *pro bono* representation to detained immigrants in proceedings before the Executive Office for Immigration Review and U.S. Immigration and Customs and Enforcement SIFI prioritizes representing detained individuals in seeking their release from ICE custody. SIFI also represents some individuals in the merits phase of their removal proceedings before the immigration courts and in appeals to addition, SIFI provides *pro se* support to detained individuals in their custody and merits proceedings before ICE and the immigration courts.

2. SIFI represents individuals confined inside the following detention centers in Louisiana and Geor

concerned that COVID-19 would spread quickly among the detained population and the surrounding communities. Our concerns include the grave impacts COVID-19 outbreaks will have on the under-resourced, rural communities the detention centers we serve are a part of. It became clear and necessary for our staff to seek the immediate release of detained immigrants with certain medical conditions who are particularly vulnerable to complications arising of COVID-19. SPLC partnered with Asian Americans Advancing Justice-Atlanta and Kilpatrick, Townsend, & Stockton LLP (collectively, Counsel to seek

facilities are

must be coordinated and provided by Habeas Counsel. There is no ability to request a remote legal visit for the weekend or in the evening. There is also no ability to schedule an expedited remote legal visit for any reason.

12. In my experience, when Irwin finally responds to a request for a remote legal visit, Irwin

16. Petitioners who require the services of an interpreter to speak with Habeas Counsel generally require more than twice as many hours of legal visitation but are subject to the same time constraints discussed above.
17. Below are but a few of the additional barriers my co-counsel and I have encountered in trying to communicate effectively with clients and potential petitioners in this case.
18. On April 15, 2020, Victoria Mesa requested a remote legal visit with one of our petitioners detained at Irwin by emailing the designated contact at Irwin. Ms. Mesa sent several emails following up on this request. Irwin did not respond until April 17, 2020.
19. On April 15, 2020, Hillary Li also requested a remote legal visit with a potential plaintiff detained at Irwin by emailing the designated contact at Irwin. Ms. Li followed up multiple times on this request to which Irwin failed to adequately respond. Ultimately, this remote legal visit was never scheduled. As a result, Habeas Counsel was unable to interview this individual for potential inclusion in our litigation. Similar restrictions have negatively impacted the Habeas Team's ability overall to identify, communicate with, and ultimately include potential petitioners at these facilities in our litigation.
20. On April 15, 2020, I requested remote legal visits for two of our petitioners detained at Irwin by emailing the designated contact at Irwin. I sent emails following up on this request on April 16 and 17. On April 17, I received an unexpected Skype call from one of the petitioners. Irwin had failed to confirm the date and time of this remote legal visit.

detention centers has been severely limited and rendered ineffective. Remote legal visitation is difficult and sometimes impossible to schedule. When it is scheduled, it often raises confidentiality issues, as our clients are not in private settings. Exchanging documents and obtaining client signatures ordinary necessities in direct immigration representation is also slow and unreliable at the facilities.

26. My co-counsel and I are deeply concerned for the lives of our petitioners as we witness detention center conditions deteriorate rapidly as they await completion of their civil immigration matters. continued failure to respect the lives and dignity of detained migrants and callous disregard for the urgent humanitarian crisis unfolding before us as COVID-19 wreaks havoc throughout our society.

27. We are -assess and release significant numbers of immigrants that is required to meet social distancing guidelines within these spaces of confinement; refusal to adequately educate and inform detained individuals on critical information relating to COVID-19; continued transfer of detained individuals who are medically vulnerable or who have been exposed to COVID-19; disturbing refusal to provide basic hygiene supplies for detained individuals; and, failure to provide treatment and testing to those exhibiting COVID-19 symptoms.

I 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, memory, and belief.

Executed on the 5th day of May, in the year 2020, in the city of Stone Mountain, Georgia.

Lorilei Williams
Southeast Immigrant Freedom Initiative