

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ANGELICA S., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:25-cv-1405-DLF
	)	
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE SUPPLEMENTAL MEMORANDUM OF  
POINTS AND AUTHORITIES REGARDING PLAINTIFFS’ MOTION FOR CLASS  
CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 7(b), Plaintiffs respectfully move for leave to file a supplemental brief regarding Plaintiffs’ Motion for Class Certification (ECF Nos. 9, 51), to add Lorenzo V., Esmeralda C., and Brian G. as additional proposed class representatives, and to submit evidence that members of the provisionally certified class remain in ORR custody and would be harmed if the preliminary injunction is not converted to a permanent injunction or vacatur. Good cause exists to support this motion because on Apr. 29, 2026, Plaintiffs moved for leave to file a Second Amended Complaint adding Lorenzo V., Esmeralda C., and Brian G., as named Plaintiffs (ECF No. 96). Good cause also exists to submit additional evidence to demonstrate that members of the provisional class retain live claims. *J.D. v. Azar*, 925 F.3d 1291, 1311 (D.C. Cir. 2019).

Lorenzo V., Esmeralda C., and Brian G. remain detained because their sponsors cannot provide documents newly required by the Office of Refugee Resettlement (“ORR”) on or after March 7, 2025, and they seek to represent the same putative class as the original named

Plaintiffs. *See* ECF 37-1, Amended Proposed Order Granting Plaintiffs' Motion for Class Certification and Appointment of Class Counsel. Each of the newly added Plaintiffs entered ORR custody after April 22, 2025, and their inclusion as class representatives would address the Court's mootness concerns as articulated at the hearing on the Parties' cross-motions for summary judgment and the telephonic hearing that followed. Motion for Summary Judgment Hearing Transcript at 5; Minute Order of March 23, 2026. Similarly, Plaintiffs offer additional evidence regarding members of the provisionally certified class to further address the Court's mootness concerns. *Id.*

Plaintiffs' proposed supplemental brief and exhibits are attached as Exhibit A. A proposed order is also attached.

On March 30, 2026, Defendants' counsel informed Plaintiffs' counsel that Defendants did not object to Plaintiffs' request to file a supplemental brief regarding class certification conditioned on Defendants having 30 days to respond. On April 29, 2026, Defendants' counsel informed Plaintiffs' counsel they now do not have a position on Plaintiffs' request because they have not had the opportunity to review Plaintiffs' proposed supplemental brief.

April 29, 2026

Respectfully submitted,

/s/ Mishan Wroe

Mishan Wroe (admitted *pro hac vice*)

Diane de Gramont (admitted *pro hac vice*)

NATIONAL CENTER FOR YOUTH LAW

428 13<sup>th</sup> Street, Floor 5

Oakland, California 94612

(510) 835-8098

[mwroe@youthlaw.org](mailto:mwroe@youthlaw.org)

[ddegramont@youthlaw.org](mailto:ddegramont@youthlaw.org)

Rebecca Wolozin (D.C. Bar No. 144369)

NATIONAL CENTER FOR YOUTH LAW

818 Connecticut Avenue NW, Suite 425  
Washington, DC 20006  
(202) 868-4792  
dhinojosa@youthlaw.org  
bwolozin@youthlaw.org

Cynthia Liao (admitted *pro hac vice*)  
Joel McElvain (D.C. Bar No. 448431)  
Skye L. Perryman (D.C. Bar No. 984573)  
DEMOCRACY FORWARD FOUNDATION  
P.O. Box 34553  
Washington, D.C. 20043  
(202) 448-9090  
cliao@democracyforward.org  
jmcelvain@democracyforward.org  
sperryman@democracyforward.org

# **EXHIBIT A**

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

---

ANGELICA S., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:25-cv-01405-DLF
	)	
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	

---

**PLAINTIFFS' SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION AND NEW CLASS REPRESENTATIVES**

Plaintiffs respectfully submit this supplemental brief in support of their motion for class certification. Plaintiffs ask that the newly added Plaintiffs, Lorenzo V., Esmeralda C., and Brian G., be appointed class representatives, along with the existing class representatives. Plaintiffs further submit evidence regarding provisional class members who continue to have live claims.

### FACTS

This Court certified a provisional class for the purposes of a preliminary injunction on June 9, 2025. ECF No. 34 (“PI Order”); ECF No. 35 at 19-22 (“PI Opinion”). Plaintiffs filed their First Amended Complaint on August 15, 2025, adding three named child plaintiffs. ECF No. 48. With leave of court, Plaintiffs filed a supplemental brief in support of class certification related to those new plaintiffs. ECF No. 56. On April 29, 2026, Plaintiffs moved for leave to file a Second Amended Complaint adding named Plaintiffs Lorenzo V., Esmeralda C., and Brian G. ECF 96.

Lorenzo V. is a 15-year-old boy in the custody of the Office of Refugee Resettlement (“ORR”) since September 2025. Ex. 1, Decl. of Lorenzo V. ¶ 2. Lorenzo’s brother lives in South Carolina and tried to sponsor him but could not do so because he lacked U.S.-issued identification. *Id.* ¶ 4. Lorenzo’s sister-in-law Lucy V. is a U.S. citizen with acceptable identification but similarly could not sponsor Lorenzo because her household members (Lorenzo’s brothers) lack newly required identity documents. *Id.* ¶¶ 4-5. Although Lorenzo’s brother and sister-in-law are eager to care for him, he remains detained because ORR refuses to accept his brothers’ foreign passports. *Id.* ¶ 5. Lorenzo feels despondent being away from his family. *Id.* ¶¶ 11-13.

Esmeralda C. is a 17-year-old girl detained with her baby boy in Connecticut in ORR custody, despite efforts by her mother, older sister, and family friends to sponsor her. Ex. 2, Decl. of Esmeralda C.; Ex. 3, Decl. of Elizabeth C. She and her son entered ORR custody in September 2025. Esmeralda Decl. ¶ 2. Her mother previously sponsored Esmeralda’s older sister from ORR

custody without any issues and promptly asked to sponsor Esmeralda and her son. *Id.* ¶¶ 3-4; Elizabeth Decl. ¶¶ 2-3. Despite being previously approved as a sponsor, Esmeralda's mother at first was unable to proceed with her application because she lacks newly required identification and proof of income documents. Esmeralda Decl. ¶ 4; Elizabeth Decl. ¶ 3. Months later, ORR offered her mother the possibility of an exception to the proof of identification requirements. Elizabeth Dec. ¶ 3. By then, however, Esmeralda's mother decided to withdraw and look for someone who had the required documents because she does not have proof of income documents and because she is aware that the rules have changed, and she fears that ORR would share her information with immigration enforcement officers. *Id.* ¶¶ 4-5; Esmeralda Decl. ¶¶ 4-5.

Esmeralda's sister Elizabeth applied to be her sponsor but was told she was unlikely to be approved because ORR considered her too young. Elizabeth Dec. ¶ 6. A family friend with acceptable identification applied next, but ORR informed him he would not be approved because he lacked sufficient proof of income by himself, and he could not include other sources of financial support such as from Esmeralda's mother. *Id.* ¶ 7. Esmeralda's mother identified yet another willing sponsor, but although he had acceptable identification, his wife did not. *Id.* ¶ 8. Esmeralda wishes she could have her mom and sister's support as she raises her son. Esmeralda Decl. ¶ 9.

Brian G. is a 13-year-old boy detained in ORR custody in Illinois. *See generally* Ex. 4, Decl. of Brian G. He entered ORR custody in May 2025. *Id.* ¶ 2. Brian was unable to reunify with his uncle because his uncle cannot obtain a form of identity document newly required by ORR. *Id.* ¶¶ 3-4. Brian's cousin then applied to sponsor him. *Id.* ¶ 5. His cousin was living with her parents, but they moved out of the home because they lacked newly required forms of identification. *Id.* It became too difficult for her parents to live separately, particularly given how long the application process was taking, so Brian's cousin withdrew her application. *Id.* Brian has now been held apart

from his family for almost a year. *Id.* ¶ 2. Brian hopes to one day live with his uncle, eat his favorite foods, and work on cars instead of feeling stuck in custody. *Id.* ¶¶ 7-8, 10-11.

## ARGUMENT

### A. The New Plaintiffs Meet the Requirements of Rule 23.

Like the original named Plaintiffs, Lorenzo V., Esmeralda C., and Brian G. challenge the March 25, 2025 Interim Final Rule, and ORR’s new sponsor proof of identification and proof of income policies issued on March 7, 2025, and April 15, 2025, respectively.<sup>1</sup> Lorenzo, Esmeralda, and Brian have the same relevant characteristics as previously named Plaintiffs and seek to represent the same class: “all unaccompanied children who are or will be in the custody of HHS and who (a) have or had a potential sponsor who has been identified; and (b) the sponsor’s family reunification application has been denied, closed, withdrawn, delayed, or cannot be completed because the sponsor is missing documents newly required on or after March 7, 2025.” *See* PI Order; Lorenzo Decl. ¶¶ 14-15; Esmeralda Decl. ¶¶ 10-11; Brian Decl. ¶¶ 12-13.

As with the other class representatives (*see* ECF No. 9-1, Pls.’ Class Cert Motion at 4-8), these children’s sponsors have tried to meet ORR’s sponsorship application requirements, but they or their household members cannot do so due to their immigration status. Esmeralda Decl. ¶¶ 4-5, 7; Elizabeth Decl. ¶¶ 3-9; Lorenzo Decl. ¶¶ 4-5; Brian Decl. ¶¶ 3-5. These children suffer “the same injury—extended detention by ORR—as a result of the new sponsor requirements.” PI Opinion at 20. They have all lost the opportunity for timely release to their closest relatives, and in some cases the opportunity for any release at all. *See* ECF No. 58-1, Pls.’ Mot. for Summ. J. at 12-14; *see also, e.g., CC Distributors, Inc. v. United States*, 883 F.2d 146, 150 (D.C. Cir. 1989).

---

<sup>1</sup> Plaintiffs maintain that their claims remain live whether or not new plaintiffs are named, because they have sought class certification. *See J.D. v. Azar*, 925 F.3d 1291, 1308–11 (D.C. Cir. 2019).

For the same reasons articulated in prior filings, the new putative class members' claims are typical of the claims of the members of the proposed class. *See* Pls.' Class Cert. Motion at 16-17; ECF No. 63, Pls.' Suppl. Reply in Supp. of Class Cert. at 6-13 ("Suppl. Class Cert. Reply"). As this Court recognized, "typicality and commonality inquiries tend to merge." PI Opinion at 21 (citations omitted). Lorenzo, Esmeralda, and Brian present the same claims as the previously named Plaintiffs, and these claims are typical of the class as a whole. The ORR policies—permitted only because ORR issued the IFR allowing itself to reject sponsors due to immigration status—have caused and continue to cause delay, withdrawal, or denial of sponsorship applications and consequent prolonged detention. *See generally* Lorenzo Decl.; Esmeralda Decl.; Brian Decl.

If the Court deems it necessary to ensure typicality, Plaintiffs renew their request that the Court certify a main class of unaccompanied children in HHS custody affected by the new sponsorship requirements without any date limitation and a reliance subclass of children who were in or transferred to the custody of HHS on or before April 22, 2025. *See* ECF No. 37, Pls.' Reply in Supp. of Class Cert at 2; ECF No. 87, Pls.' Notice at 1-2. (The reliance subclass is defined identically to the provisional class already certified by this Court. PI Order at 1.) Plaintiffs propose Lorenzo, Esmeralda, and Brian as representatives for the main class only. They will adequately protect the interests of the class for the same reasons articulated in Plaintiffs' previous filings, which Defendants did not contest. Pls.' Class Cert. Motion at 18-19; PI Opinion at 22; *see* Esmeralda Decl. ¶¶ 10-11; Brian Decl. ¶¶ 12-13; Lorenzo Decl. ¶¶ 14-15.

**B. Provisional Class Members Remain in ORR Custody with Live Claims.**

Contrary to Defendants' suggestion, ECF No. 76 at 3, there are provisional class members who entered ORR custody before April 22, 2025, who are still in ORR custody. *See* Ex. 5, Decl. of G.B.J. ¶¶ 3, 9, 15-17, 19-21 (3-year-old and 7-year-old in custody since separation from

grandmother in January 2025; grandmother was permitted to proceed with sponsorship under the preliminary injunction despite lacking proof of identification or of income, but has not yet been able to find a required alternative caregiver); Ex. 6, Decl. of Q.A.P.V. ¶¶ 2-8 (16-year-old in custody since December 2024 unable to reunify with brother because brother's household members cannot meet identification requirements); Ex. 7, Decl. of Y.R.M. ¶¶ 2-6 (17-year-old in custody since January 2025; second attempted sponsor unable to meet identification requirements).<sup>2</sup> If the Court's preliminary injunction were dissolved, these class members would face even greater difficulties in release. *See, e.g.*, G.B.J. Decl. ¶¶ 19-22.

Defendants are also wrong about the provisional class being "non-replenishable." ECF No. 76 at 3. Children who entered ORR custody before April 22, 2025, and who had been released to sponsors, are continuously being re-detained and subjected to the challenged identification and income policies. *See* Ex. 8, Decl. of Benito S. ¶¶ 2-7, 10 (re-detained child's previously approved sponsor cannot meet new identification requirements);<sup>3</sup> *see also E.F.E.L. v. Noem*, No. 26-cv-02507, 2026 WL 1045550, \*2, 4-5 (N.D. Ill. Apr. 17, 2026) (granting habeas petition of 15-year-old child who was released to his brother in March 2025 but re-detained in December 2025, after ORR refused release because the brother lacked newly required identification).

### CONCLUSION

Plaintiffs respectfully ask that the court appoint Lorenzo V., Esmeralda C., and Brian G. as class representatives, and consider the attached declarations regarding provisional class members.

---

<sup>2</sup> It is unclear why ORR failed to fully apply the Court's preliminary injunction to Q.A.P.V. and Y.R.M., but Plaintiffs note their continued disagreement with Defendants on the scope of the provisional class definition, and specifically its application to sponsors identified after April 22, 2025. *See* Plaintiffs' Mot. for Relief from Standing Order 25-55, ECF 65 at 2-3 fn. 1; Plaintiffs' Opp. to Defs.' MSJ and Reply in Support of MSJ, ECF 73 at 4.

<sup>3</sup> This declaration was originally filed in *Diego N. v. HHS*, Case No. 26-577 (D.D.C.), where Benito is a named plaintiff proceeding under pseudonym.

April 29, 2026

Respectfully submitted,

/s/ Mishan Wroe

Mishan Wroe (admitted *pro hac vice*)  
Diane de Gramont (admitted *pro hac vice*)  
NATIONAL CENTER FOR YOUTH LAW  
428 13<sup>th</sup> Street, Floor 5  
Oakland, California 94612  
(510) 835-8098  
mwroe@youthlaw.org  
ddegramont@youthlaw.org

Rebecca Wolozin (D.C. Bar No. 144369)  
NATIONAL CENTER FOR YOUTH LAW  
818 Connecticut Avenue NW, Suite 425  
Washington, DC 20006  
(202) 868-4792  
bwolozin@youthlaw.org

Cynthia Liao (admitted *pro hac vice*)  
Joel McElvain (D.C. Bar No. 448431)  
Skye L. Perryman (D.C. Bar No. 984573)  
DEMOCRACY FORWARD FOUNDATION  
P.O. Box 34553  
Washington, D.C. 20043  
(202) 448-9090  
cliao@democracyforward.org  
jmcelvain@democracyforward.org  
sperryman@democracyforward.org

*Angelica S. et al. v. HHS et al.*, 1:25-cv-1405

**Exhibit Index to Plaintiffs' Supplemental Motion for Class Certification**

<b>Exhibit</b>	<b>Exhibit Description</b>
1	Declaration of Lorenzo V., April 21, 2026
2	Declaration of Esmeralda C., April 10, 2026
3	Declaration of Elizabeth C., April 27, 2026
4	Declaration of Brian G., April 22, 2026
5	Declaration of G.B.J., April 11, 2026
6	Declaration of Q.A.P.V., March 30, 2026
7	Declaration of Y.R.M., April 3, 2026
8	Declaration of Benito S., February 20, 2026

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

---

ANGELICA S. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	No. 1:25-cv-01405
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	

---

**DECLARATION OF LORENZO V.**  
(proceeding under pseudonym)

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

_____	)	
ANGELICA S., ET AL.	)	
Plaintiffs,	)	
	)	
v.	)	No. 25-cv-1405 (DLF)
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, ET AL.	)	
Defendants.	)	
	)	
_____	)	

**DECLARATION OF [REDACTED]**

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 15 years old and I am from [REDACTED]. I arrived in the United States around September 2025. I entered alone, and was taken to a shelter in Georgia. I was recently transferred and am now at a shelter in Virginia.
3. Two of my brothers are here and they live in South Carolina. My oldest brother lives with his wife and my middle brother. They have both been in the United States for many years.
4. My oldest brother became my sponsor after I got to the shelter. But he was told he couldn't sponsor me because he did not have an ID from South Carolina or somewhere in the United States. My middle brother also didn't have the right kind of ID. They both have their passports but I guess those were not the right kind of ID to use for sponsorship.
5. My oldest brother's wife, my sister-in-law, is a U.S. citizen, so they decided that she should be my sponsor because she does have the right documents. But then ORR told her that even though she had the correct form of ID, they could not approve or move forward with her

sponsorship because my brothers, who lived with her in the same house, did not have the correct form of ID.

6. Now, my understanding is that a different sister-in-law is my sponsor. She and my brother were married in [REDACTED], but then my sister-in-law and her family received permission to enter the United States so they came to live here. She is here now with my niece now. My brother – her husband – is not living with her because he has not received permission to enter the United States. I hope my sister-in-law will be able to be approved as my sponsor because I think she and her whole family have legal immigration status so they have the documents that ORR is requiring for sponsors. She started the sponsorship process about two months ago. I do not know how long it will take. They have sent her a lot of paperwork so she is reviewing it and trying to complete the application and the requirements. They have also asked her for a lot of documents that she is working on getting together to provide to ORR.

7. I am glad that I found another person who I know to be my sponsor. But I really wanted to go live with my brothers, and I feel sad not being with them. I know my oldest brother and his wife would do a good job taking care of me. And I am also a little mad. I get mad that my reunification case goes so slowly. It drives me a little crazy.

8. In my shelter in Georgia, I felt really bored. It was the same thing every day. We couldn't leave, we couldn't meet other people, and I couldn't go to a real school. The school there was very small. It was just two classrooms. I wanted to be able to learn more than I did there. I also wanted to be able to explore, and to learn about American culture and improve my English by using it more. There, school was a mix of English and Spanish, and a lot of other things were mostly in Spanish.

9. We were not allowed to leave the little campus either. We just went back and forth between the two buildings over and over again. One where we slept, the other where the schoolroom was and where there were offices. We were locked in there. We couldn't go to stores or to parks. We were not allowed to explore the area and we could not meet any other people. We just saw the same people every day. But the people were not family or people that know and love you. It was like living with strangers who you see every day.

10. Now in my new shelter, the people I live with and see every day are brand new strangers, even more strangers than the people I had gotten to know a little at my old shelter. It is hard to have to change to different programs, where you have to learn all new rules and meet all new people. I just want to be able to go live with my family.

11. To be able to make it through all of this, I try to keep hope that I will be released. I make myself think that it will be just a little bit longer, and then I will be able to leave.

12. If that doesn't work, I try to distract myself by playing basketball or soccer. If I can't make myself think hopeful thoughts and playing sports doesn't work to distract me, I try to just go to sleep. I try to sleep so that I don't have to feel so sad.

13. I want to be able to leave here. I want to live with my family.

14. I also want to help other kids in the same situation as me, who have been in government custody for so long because their sponsors didn't have the documents the government demanded. I want to fight for all of our rights so we can have the chance to go live with our families.

15. Based on what I understand a class representative does, I want to represent a class of children and young people in the same situation as me by sharing my story and thinking about the interests of all of the kids in my situation. I will work with the lawyers so that the lawyers do what is best for all the children in the case, and I will participate in the lawsuit according to the way in which my lawyers and I decide I should. I intend to remain involved with this case and to represent the class the best that I can.

16. I have never served as a class representative in any other case. I am ready to do my best to help kids like me.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct to the best of my belief and understanding.

Executed on this 21<sup>st</sup> day of April, 2026 in Virginia.

[Redacted signature]

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: April 21, 2026

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

---

ANGELICA S. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	No. 1:25-cv-01405
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	

---

**DECLARATION OF ESMERALDA C.**  
(proceeding under pseudonym)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ANGELICA S., ET AL.	)	
Plaintiffs,	)	
	)	
v.	)	No. 25-cv-1405 (DLF)
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, ET AL.	)	
Defendants.	)	
	)	
_____	)	

**DECLARATION OF [REDACTED]**

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 17 years old and I am from [REDACTED]. I speak Spanish and [REDACTED]. I arrived in the United States around September 2025 with my son who was a little baby. We entered alone. We were taken to the a shelter in Arizona. My son and I spent many months there, and then we came here to the long-term foster care program in Connecticut. Now my baby is one year old.
3. My mom and my sister live in the United States in Iowa. My mom applied to be my sister’s sponsor a few years ago when my sister was in ORR custody. ORR approved my mom to be my sister’s sponsor then, and my sister has been living with her and is doing well. My sister is an adult now.
4. When my son and I arrived at the shelter, our plan was to go live with them. My mom became my sponsor, like she had for my sister. But this time, my mom did not have the right kind of identity document, and she could not provide the right kind of proof of her income either. It took a long time, and she tried to get the documents they were asking for, but she could not do

it. I think she couldn't get those documents because she's not a legal permanent resident and she doesn't have a work permit.

5. It seemed like it was taking so long, and it seemed like she couldn't get those papers the government was requiring, so she decided to withdraw as my sponsor and look for someone with the right documents. My mom was also very afraid that ORR would share her information with immigration officers and they would arrest her this time, even though that didn't happen when she sponsored my sister. She knew that things had changed a lot this past year. If she was arrested, she wouldn't even be able to help support me and my son if I got released, so she did not want that to happen.

6. When we asked if my sister could be my sponsor because she does have work authorization and a driver's license, I think ORR said she was too young to sponsor both me and my baby. Even though I think she got a letter from her employer and everything. So my sister couldn't be my sponsor either.

7. Then my mom found a friend who had the right kind of ID document to sponsor me. But then, I think he couldn't provide the right documents to show his income. In the end, they told him that he could not be my sponsor.

8. Finally, my baby and I applied to go to long term foster care. That is where we are now. We have been in the custody of the government for more than six months now. We are just waiting until I turn 18 later this year, and then I think we will be able to leave.

9. I wish I could live with my mom and my sister and raise my son with them. It is hard to do it alone and far away from people who know me and love me. And when I have questions or want advice or help with my son, the people who are caring for me do not know my culture or my background. They are nice but it is hard to ask them for things sometimes. I would feel more comfortable if I were with my family.

10. I also want to help other young people in the same situation as me, who have been in government custody for so long because their family member's didn't have the documents the government demanded. It is not right that I should have to live with strangers and raise my baby in government custody when my mom and my sister are here and love me and can help take care

of me and my baby. I want to fight for all of our rights so we can have the chance to go live with our families.

11. Based on what I understand a class representative does, I want to represent a class of children and young people in the same situation as me by sharing my story and thinking about the interests of all of the kids in my situation. I will work with the lawyers so that the lawyers do what is best for all the children in the case, and I will participate in the lawsuit according to the way in which my lawyers and I decide I should. I intend to remain involved with this case and to represent the class the best that I can.

12. I have never served as a class representative in any other case. I am ready to do my best to help kids like me.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct to the best of my belief and understanding.

Executed on this 10 day of April, 2026 in Connecticut.

[Redacted Signature]

Name: [Redacted Name]

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: April 10, 2026

# **EXHIBIT 3**



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ANGELICA S., ET AL.	)	
Plaintiffs,	)	
	)	
v.	)	No. 25-cv-1405 (DLF)
	)	
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, ET AL.	)	
Defendants.	)	
_____	)	

**DECLARATION OF** [REDACTED]

I [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 20 years old and I am from [REDACTED]. I speak Spanish and [REDACTED]. I am the older sister of [REDACTED]. I arrived in the United States in 2022 as an unaccompanied minor. I was sent to an ORR shelter then. My mother was already in the United States, and she applied to be my sponsor. In 2022 she went through the whole sponsorship process. I think she provided her identity documents and the other documents that were requested. ORR approved her to be my sponsor, and I have been living with my mother since then. We live in Iowa.
3. My younger sister [REDACTED] arrived in the United States last year, around September, with her son who was about six months old. They were in a shelter in Arizona after they arrived. Just like for me, my mom applied to be my sister's sponsor right away. But this time, it was harder and different than it had been when she sponsored me. She didn't have the type of ID document that ORR was requiring this time, because she doesn't have legal permanent residency or work authorization or a driver's license. At some point they told my mom she might qualify for an exception so that she could use her ID after all, but it was already months into the process when

they offered it. ORR also wanted proof of her income, but even though she can financially support my sister and nephew, she didn't have the kind of documents they now require, like pay stubs. I don't think they offered an exception to that proof of income requirement.

4. When my mom sponsored me, she understood that being a sponsor would not lead to her information being shared with immigration officials in order to detain or deport her. But this time, my mom learned that the process was very different because the rules have changed, and she was afraid that moving forward with the reunification process for my sister would mean that ORR would give her information to immigration officers and she would be detained. She was worried for us if that happened. My father passed away about 12 years ago and she is all we have.

5. Because she did not have the new required documents to sponsor my sister, and then because she was so afraid that the sponsorship process would lead to her getting detained, she decided not to continue with the process.

6. After my mom was unable to continue sponsorship, we asked if I could be the sponsor instead. I do have work authorization and I have a driver's license. They asked for a letter from my employer on the employer's paperwork, and proof of how much money I make in my job. I was able to provide that. But then they told me I could not sponsor my sister and her baby together. I think it was because they thought I was too young to take responsibility for my sister and my nephew by myself. They did not seem to consider that we would also be living with my mom and we were a family. I knew that my mom did not have the required form of ID documentation as a household member anyway. ORR did not explain much, but I understood that they did not think I could sponsor [REDACTED], so I withdrew also so that someone else could sponsor [REDACTED].

7. Then my mom found a family friend who had the right kind of ID document to sponsor my sister and was older than me. He provided all the information, including how much money he earns a year. They told him that his income was not enough to support both [REDACTED] and her son. At first, they said that he could also include financial support for [REDACTED] from my mom, but then they said that he had to provide enough financial support for [REDACTED] by himself to be approved, and he

could not ask anyone else to contribute money. They said that if he had to ask others to contribute for support of [REDACTED], even our mom, it would disqualify him.

8. My mom asked a brother from our church, who is a good family friend, if he and his wife could sponsor [REDACTED] and they were willing. But although the church brother had the required documentation, his wife did not, so they also could not be sponsors for [REDACTED].

9. At this point, we feel like we have no option except to wait until [REDACTED] turns 18, and we are hoping that she and my nephew can just be released to us then. It does not seem like there are any options for her to get released to a family member or even a trusted family friend.

10. It does not seem fair that ORR would not let my sister go to our mother when they approved her before in 2022 and nothing has changed, and they know that she took good care of me after they released me to her. She is the same sponsor, and she is the mother. It also does not seem right that ORR would be helping immigration officials detain the parents of the children they are trying to send to those parents.

11. This whole experience has been so difficult for [REDACTED]. She has spent over half a year raising her first baby while she is in government custody. My nephew was only six months old when they arrived, and we were hoping to be able to welcome them home and celebrate his first birthday and his first foods and his first steps together. We should have been able to share our indigenous culture with him, and our language and food. Instead [REDACTED] has had to raise him while living with strangers, who are kind but who are not her family. And my nephew does not know his grandmother and his aunt.

12. I was an unaccompanied child in ORR custody and I know it is not anywhere any kid should have to stay when they have loving family to go to. My mom's immigration status does not affect her ability to love and care for us and I don't think it is right that she is unable to sponsor my sister because of that. It breaks my heart that my sister and my nephew have been kept apart from us for so long. I cannot wait until they can finally come home to Iowa and we can be together.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct to the best of my belief and understanding.

Executed on this 27th day of April, 2026 in ██████ Iowa.

████████████████████  
████████████████████  
████████████████████

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: April 27, 2026

# **EXHIBIT 4**



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANGELICA S., ET AL.	)	
Plaintiffs,	)	
	)	
v.	)	No. 25-cv-1405 (DLF)
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, ET AL.	)	
Defendants.	)	
	)	
	)	
	)	

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 13 years old and I am from [REDACTED]. I arrived in the United States in the beginning of May 2025 when I was 12 years old. I was by myself. I was sent to a shelter in Georgia where I was held for almost a year. About a week ago I was transferred to a new program in Illinois that is a Long Term Foster Care program, because I could not be reunified with my sponsors.
3. When I first arrived at the shelter, my plan was to live with my uncle. He lives in Mississippi. I know him from when I was a kid in [REDACTED], and we're close. He wanted to be my sponsor. He talked with the case manager about the application process. But then, from what I understand, he couldn't even start the sponsorship application process because he is an immigrant like me. He didn't have a work permit, and he didn't have a visa. I think they needed these documents to show he was here legally in the United States.
4. Because he didn't have the right kind of ID, he couldn't start the sponsorship process.
5. After my uncle was not able to sponsor me, a cousin became my sponsor. I think she did have the right kind of ID. But that application process took a very long time. From what I

understand, part of the reason it took so long is that her parents, my aunt and uncle, did not have the required forms of ID that ORR wanted. So they moved out of the house so that my cousin could continue the sponsorship without them and I could get released. Then it was just my cousin and her two younger siblings living together. After about six months, I still wasn't released and ORR wanted to restart some of the steps. Living apart from her parents with her siblings was really hard on their whole family. It did not seem like ORR was going to let me reunify with them because it was taking so long, and the process was so demanding and required my cousin to do so many things. When ORR just kept adding steps, she eventually withdrew. She could not continue anymore. That is my understanding of what happened when my cousin was my sponsor.

6. After so much time, I decided that I did not want to risk putting any more of my family members through the process. And I thought that trying with more and more family would just make me stay detained in the shelter longer just for them to be disqualified or have to withdraw. That is why I decided instead to try to go to Long Term Foster Care where I could have a little more freedom. At least in the long-term program I would be able to go to a normal school instead of just basic classes. In my Georgia shelter, school was just lessons in a room of a small building. Our classes were downstairs, and the offices were upstairs. Mostly we learned English and some math. It got pretty boring.

7. I sort of had friends in my Georgia shelter. I had a friend who was here for many months, but a few weeks ago he left. It was really hard to be stuck there. I'm glad I was able to transfer to a program with a little more freedom, but I still wish I could live with my family.

8. I talk to my uncle all the time. I know my family wants the best for me, and it makes me feel good to talk to them. I wish I could live with family instead of be in government custody.

9. I know at least one other kid like me who is still detained because their sponsor did not have the required documents to sponsor them. It's a big problem.

10. If my uncle had been allowed to sponsor me, I would be living with my family and I would have more freedom. I would eat chillitos rellenos (stuffed peppers), chipotle chicken, and other kinds of [REDACTED] food I love. We don't really eat [REDACTED] food here in the program. I miss it.

11. I also really like mechanics and old cars. I think they're so cool. I think if I lived with my uncle, we could work on a project together to fix up an old car or something. Maybe we would be able to do that as an activity together.

12. I also want to help other kids like me in the same situation. I think family members should have the chance to at least start or continue the sponsorship process even if they don't have a particular kind of document or immigration status. Even if the shelter or program is a good one, children feel more comfortable and safer with their families. Kids should get a real chance to go live with their families, and go to regular school and lead a normal life.

13. Based on what I understand a class representative does, I want to represent a class of children and young people in the same situation as me. I want to represent them by sharing my story. I will think about the interests of the class so that we can have a real chance to be released to our sponsors. I will work with the lawyers so that the lawyers do what is best for all the children in the case, and I will participate in the lawsuit according to the way in which my lawyers and I decide I should. I intend to remain involved with this case and to represent the class the best that I can.

14. I have never served as a class representative in any other case. I am ready to do my best to help kids like me.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct to the best of my belief and understanding.

Declaro, bajo mi deber de decir la verdad y bajo pena de perjurio, que toda la información que he proporcionado aquí es verdadera y correcta según lo mejor de mi entendimiento y conocimiento.

Executed on this 22nd day of April, 2026 in ██████████, IL.

██████████

Name: \_\_\_\_\_

████████████████████

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: April 22, 2026

# **EXHIBIT 5**

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

---

ANGELICA S. *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 U.S. DEPARTMENT OF HEALTH AND )  
 HUMAN SERVICES, *et al.*, )  
 )  
 Defendants. )

---

No. 1:25-cv-01405

**DECLARATION OF G.B.J.**

I, Soraya Morales Nuñez, declare as follows:

1. I am fluent in English and Spanish.
2. The following is a true and correct translation of the annexed declaration of [REDACTED].

\*\*\*

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am over 18 years of age and I am from [REDACTED]. I currently live in Texas with my minor son.
3. I arrived in the United States in January 2025 with my son, my grandson [REDACTED], and my granddaughter [REDACTED]. When we arrived, [REDACTED] was 6 years old and [REDACTED] was 2 years old. We arrived after making an appointment on the CBP One app.
4. I have been the primary caregiver for my grandchildren, [REDACTED] and [REDACTED], since they were babies. Their mother is my daughter, and she placed them in my care. [REDACTED] lived with me as a baby and then briefly went back to his mother before she left him with me again when he was about 3 years old. [REDACTED] lived with me since she was a newborn. The children call me mama. Their mother is not in contact with us. Their father was not part of their lives and has passed away.

5. When we arrived in the United States after our CBP One appointment, the border officials took [REDACTED] and [REDACTED] away from me and sent them to a shelter in Texas by themselves. They said they were separating us because I am not their mother.

6. I have a document from my home country that I think recognized my custody of [REDACTED] and [REDACTED] but the border officials separated us anyway. I am not sure why the agents did not accept my document.

7. The separation was horrible. The children are so young and did not understand what was happening.

8. Although the government took my grandchildren into their custody, my son and I were released while we try to get stable immigration status. Now we live in Texas.

#### Sponsor Application process

9. My grandchildren have been in Office of Refugee Resettlement custody for over a year now and have been moved to three different programs. [REDACTED] is now 7 years old and [REDACTED] is 3 years old.

10. Even though I entered with [REDACTED] and [REDACTED] and have been their caregiver for most of their entire lives, I was told I had to go through a sponsorship application to get them back. I was hopeful that the process would be quick since they are so little and I'm the only family they know. But it has been really hard and complicated. I have tried to do everything in my power but every time I feel like I get closer, it gets more difficult.

11. At the beginning, the government sent them to a shelter in Texas. They were not living with a family. I think it was a place with a lot of other children. They did not let me visit them in this shelter. We just did video calls. I was really worried about them and sad. I suffered a lot of

anxiety and I could not sleep. [REDACTED] had a lot of hope when we arrived in the U.S. and the separation was a source of great suffering for the children.

12. Soon after the children entered ORR custody, I spoke to the people at the shelter and told them that I wanted to sponsor them. However, they told me that before I could formally begin the sponsorship application, I needed to show that I had a stable place where the children could live. That requirement made sense to me. But I had just arrived in the United States and it took some time to find an apartment.

13. At the end of February, the children were transferred to a program in New York where they lived with a substitute family. I was really worried because at first they did not tell me that they would be with a family and I did not know anything about the family. We had video calls when they were at the ORR program but I never had video calls at the house. I could not see where they were living and I did not know the family. The separation was especially difficult for [REDACTED]. He became aggressive. They diagnosed him with ADHD. In [REDACTED] he did not have those same symptoms, but with the trauma of separation he had many more problems.

14. By around March, I had an apartment and was allowed to fill out the sponsorship application. I sent the government all the information on my new address. I could not provide the children's birth certificates because the Border Patrol officers confiscated their birth certificates when we first entered and did not give them back. I don't know why ORR could not ask the border patrol for the birth certificates. Maybe the birth certificates were lost. I had to ask someone in [REDACTED] to help me get new birth certificates and that took a long time. While we were waiting, the government asked me to do a DNA test. I did a DNA test and that showed I was the grandmother. I also gave my fingerprints and there were no problems.

15. Then I think the requirements changed and the ORR worker told me I needed a different kind of identification like a work permit or an identification from the United States. I only had my national identity card from [REDACTED] because I had just arrived in the country. I also couldn't provide paystubs because I didn't have my work permit yet. I applied for asylum, but the process to get a work permit takes a long time and costs money. So, my sponsorship application was on hold and the children had to keep waiting in ORR custody while I tried to get a work permit.

16. During the summer of 2025, the ORR case worker told me I could continue my application with my national identity card. I moved to a new apartment and the government sent someone to come look at my apartment and make sure I had space for my grandkids. I think my apartment met all their requirements. The kids had their beds and their closet. They also spoke to me about services available for [REDACTED] because he has ADHD.

17. I was hopeful I could finally bring [REDACTED] and [REDACTED] home, but I had a problem with the second adult on my application. The government told me I needed a second adult who promised to take care of the children. I had a second person early in my application process, but then I could not continue with that person. I tried and tried to find someone else but the people I know here are also [REDACTED] and nobody wants to give their information to the government. The friends I asked are all afraid that their information will be used against them by the immigration authorities.

18. Without a second adult on the application, my application could not be approved. At that time the kids were living with a family in New York, but it was a short-term program. In August 2025, the ORR officials told me that if I withdrew my application the children could be transferred to a longer-term program in Connecticut. They told me it would be better for the

children than the short-term program, and they could be in public school. I agreed because I wanted the children to have more stability. [REDACTED] is now able to go to public school.

19. Even though I haven't been able to find a second person for my application yet, I have not given up on sponsoring [REDACTED] and [REDACTED]. I consider them my children and I still have faith I can bring them home.

20. I still do not have a work permit or other identification from the United States. I only have my national identification card. I am finally eligible to apply for a work permit because I applied for asylum many months ago, but I do not yet have the money for the application fee. I am hoping to be able to save enough money for that soon. Even when I am able to pay the fee, I think it will still take months to get the work permit. Without a work permit, I don't think I can provide the kind of proof of income the government wants either. I don't have pay stubs or taxes or a letter from an employer.

21. It is already so hard to find a second adult for my application and I am worried it will be even more difficult if that person also needs to have an identification from the United States.

22. I never imagined that I would be separated from my grandchildren or that it would be so difficult to get them back. They have now spent a big part of their lives living with strangers and moving from one place to another. I try to speak to them by video call every day but it is not enough, especially when they are so little and cannot understand why I am not bringing them home. [REDACTED] is calmer now in Connecticut than in New York but the family they are living with has noted that recently he is a bit more rebellious and not as calm. He wants to come back to me and feels frustrated. The woman taking care of them is an excellent person but [REDACTED] wants me because I am the person who raised him. [REDACTED] is smaller, she arrived at 2 years old and adapts more quickly, but she also misses me. [REDACTED] had a time where he was not sleeping

and he is taking melatonin to sleep. He did not have problems sleeping in [REDACTED] and I know the separation is affecting him a lot.

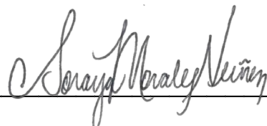
I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is correct and complete and I understand the legal consequences of testifying falsely to the authorities.

Executed on this 11th day of April, 2026, in [REDACTED], Texas.

\*\*\*

I declare under penalty of perjury that the foregoing is a true and correct translation.

Executed this 14th day of April, 2026.



---

Soraya Morales Nuñez

**DECLARACIÓN DE** [REDACTED]

Yo, [REDACTED], declaro y digo lo siguiente:

1. Esta declaración está basada en mi conocimiento personal. Los hechos que describo son verdaderos a mi mejor conocimiento.
2. Tengo más de 18 años de edad y soy de [REDACTED]. Actualmente vivo en Texas con mi hijo que es menor de edad.
3. Llegué a los Estados Unidos en enero de 2025 con mi hijo, mi nieto [REDACTED] [REDACTED], y mi nieta [REDACTED]. Cuando llegamos, [REDACTED] tenía 6 años y [REDACTED] tenía 2 años. Llegamos después de que hicimos una cita en la aplicación CBP One.
4. He sido la cuidadora principal de mis nietos, [REDACTED] y [REDACTED], desde que eran bebés. Su madre es mi hija, y ella los puso bajo mi cuidado. [REDACTED] vivió conmigo cuando era bebé y brevemente regresó con su madre antes de que ella me lo dejara otra vez cuando él tenía aproximadamente 3 años. [REDACTED] ha vivido conmigo desde recién nacida. Los niños me dicen mamá. Su madre no está en contacto con nosotros. Su padre no fue parte de sus vidas y él ha fallecido.
5. Cuando llegamos a los Estados Unidos después de nuestra cita de CBP One, los agentes fronterizos me quitaron a [REDACTED] y a [REDACTED] y los enviaron solos a un albergue en Texas. Dijeron que nos estaban separando porque yo no soy su madre.
6. Tengo un documento de mi país de origen que creo que reconocía mi custodia de [REDACTED] y [REDACTED] pero los agentes fronterizos nos separaron de todos modos. No estoy segura de porque los agentes no aceptaron mi documento.
7. La separación fue horrible. Los niños son tan pequeños y no entendían lo que estaba sucediendo.
8. Aunque el gobierno tomó a mis nietos bajo su custodia, mi hijo y yo fuimos liberados mientras intentamos obtener un estatus migratorio estable. Ahora vivimos en Texas.

Proceso de solicitud para patrocinadores

9. Mis nietos han estado en custodia de la Oficina de Reasentamiento de Refugiados desde hace más de un año y han sido trasladados a tres programas diferentes. Ahora [REDACTED] tiene 7 años y [REDACTED] tiene 3 años.

10. Aunque entré con [REDACTED] y [REDACTED] y he sido su cuidadora por la mayor parte de toda de sus vidas, me informaron que necesitaba tramitar una solicitud de patrocinador para recuperarlos. Tenía la esperanza de que el proceso fuera rápido ya que son tan pequeños y yo soy la única familia que conocen. Pero ha sido realmente difícil y complicado. He intentado hacer todo en mi poder, pero cada vez que siento que me acerco, todo se vuelve más difícil.

11. Al principio, el gobierno los envió a un albergue en Texas. No estaban viviendo con una familia. Creo que estaban en un lugar con muchos otros niños. No me permitieron visitarlos en este albergue. Solo teníamos llamadas por video. Yo estaba muy preocupada por ellos y triste. Sufrí mucha ansiedad y no podía dormir. [REDACTED] tenía mucha esperanza cuando llegamos a los EE. UU. y la separación fue un gran sufrimiento para los niños.

12. Poco después de que los niños ingresaron bajo la custodia de ORR, hablé con la gente del albergue y le dije que deseaba patrocinarlos. Sin embargo, me informaron que, antes de poder iniciar formalmente la solicitud de patrocinador, yo tenía que demostrar que tenía un lugar estable donde los niños pudieran vivir. Ese requisito me pareció lógico. Pero acababa de llegar a los Estados Unidos y tomó algún tiempo encontrar un departamento.

13. A finales de febrero, los niños fueron trasladados a un programa en Nueva York donde vivían con una familia sustituta. Yo estaba muy preocupada porque al principio no me dijeron que ellos iban a estar con una familia y no sabía nada sobre esa familia. Teníamos video llamadas cuando estaban en el programa de ORR pero nunca tenía video llamadas en la casa. No podía ver donde estaban viviendo y no conocía a la familia. La separación fue especialmente difícil para [REDACTED]. Se puso agresivo. Lo diagnosticaron con TDH. En [REDACTED] no tenía estos mismos síntomas, pero por el trauma de la separación tenía muchos más problemas.

14. En marzo más o menos, ya tenía un departamento y se me permitió completar la solicitud de patrocinador. Le envié al gobierno toda mi información sobre mi nueva dirección. No pude

presentar las actas de nacimiento de los niños porque los agentes de la Patrulla Fronteriza las confiscaron cuando entramos por primera vez, y no nos las devolvieron. No sé por qué ORR no pudo solicitar las actas de nacimiento de la Patrulla Fronteriza. Tal vez las actas de nacimiento se perdieron. Tuve que pedirle a alguien en [REDACTED] que me ayudara a conseguir nuevas actas de nacimiento, y esto tomo mucho tiempo. Mientras esperábamos, el gobierno me pidió que me hiciera una prueba de ADN. Me hice la prueba de ADN y esta confirmó que yo era la abuela. También proporcioné mis huellas y no hubo problemas.

15. Luego creo que los requisitos cambiaron y el trabajador de ORR me informó que necesitaba un tipo de identificación diferente, como un permiso de trabajo o una identificación de los Estados Unidos. Solo tenía mi documento nacional de identidad porque acababa de llegar al país. Tampoco pude presentar recibos de pago, pues aún todavía no tenía mi permiso de trabajo. Solicité asilo, pero el proceso para obtener un permiso de trabajo tarda mucho tiempo y cuesta dinero. Por lo tanto, mi solicitud de patrocinador quedo en suspenso y los niños tuvieron que seguir esperando bajo la custodia de ORR mientras yo intentaba obtener el permiso de trabajo.

16. Durante el verano de 2025, el trabajador de ORR me informó que podía continuar con mi solicitud utilizando mi documento nacional de identidad. Me mudé a un nuevo departamento y el gobierno envió a alguien para inspeccionarlo y verificar que tuviera espacio suficiente para mis nietos. Creo que mi apartamento cumplió con todos sus requisitos. Los niños tenían sus camas y su closet. También hablaron conmigo sobre los servicios disponibles para [REDACTED], ya que él tiene TDH.

17. Tenía la esperanza de poder traer por fin a [REDACTED] y a [REDACTED] a casa, pero tuve un problema con el segundo adulto en mi solicitud. El gobierno me informó que necesitaba un segundo adulto que se comprometiera a hacerse cargo de los niños. Al principio del proceso de solicitud contaba con una segunda persona, pero luego no pude seguir con esta persona. Intenté una y otra vez encontrar a alguien más, pero las personas que conozco aquí también son [REDACTED] y nadie quiere darle su información al gobierno. Todos los amigos a quienes les

pregunté tienen miedo de que su información sea utilizada en su contra por las autoridades de inmigración.

18. Sin un segundo adulto en la solicitud, mi solicitud no podía ser aprobada. En aquel momento, los niños vivían con una familia en Nueva York, pero era un programa de corto plazo. En agosto de 2025, los oficiales de ORR me informaron que si retiraba mi solicitud, los niños podrían ser trasladados a un programa de más largo plazo en Connecticut. Me dijeron que sería mejor para los niños que el programa a corto plazo, y que podrían ir a la escuela. Acepté, ya que deseaba que los niños tuvieran más estabilidad. Actualmente, [REDACTED] puede asistir a la escuela pública.

19. Aunque todavía no he logrado encontrar una segunda persona para mi solicitud, no he renunciado a patrocinar a [REDACTED] y a [REDACTED]. Los considero mis hijos y sigo teniendo fe en que podré traerlos a casa.

20. Todavía no tengo un permiso de trabajo ni ninguna otra identificación de los Estados Unidos. Solo tengo mi documento nacional de identidad. Por fin cumplo con los requisitos para solicitar un permiso de trabajo, ya que pedí asilo hace muchos meses, pero todavía no tengo el dinero para pagar la tarifa de solicitud. Espero poder ahorrar lo suficiente para ello pronto. Aun cuando logre pagar la tarifa, no sé cuánto tiempo voy a tener que esperar para recibir el permiso de trabajo. Además, sin un permiso de trabajo, no creo que puedo presentar el tipo de comprobante de ingresos que exige el gobierno. No tengo los recibos de pago ni los impuestos ni una carta de empleador.

21. Ya es muy difícil encontrar un segundo adulto para mi solicitud, y me preocupa que sea aún más difícil si esa persona también necesita tener una identificación de los Estados Unidos.

22. Nunca imaginé que me separarían de mis nietos ni que sería tan difícil recuperarlos. Ahora han pasado gran parte de sus vidas viviendo con desconocidos y mudándose de un lugar al otro. Trato de hablar con los niños por video llamada todos los días pero no es suficiente, especialmente ya que son tan pequeños y no pueden entender por qué no los llevo a casa.

[REDACTED] está más tranquilo ahora en Connecticut que en Nueva York pero la familia con quien viven ha comentado que recientemente está un poco rebelde, no es tan tranquilo. Él quiere

regresar conmigo y se siente frustrado. La señora que los cuida es una persona excelente pero [REDACTED] me quiere a mí porque soy la persona que lo crió. [REDACTED] es más chica, llegó a los dos años y se adapta más rápido, pero todavía me extraña. [REDACTED] tuvo un tiempo que no dormía y está tomando melatonina para dormir. No tenía problema para dormir en [REDACTED] y yo sé que le afecta mucho la separación.

Declaro bajo protesta de decir la verdad y pena de falso testimonio que toda la información que aquí he proporcionado es correcta y completa, consciente de las consecuencias legales de declarar con falsedad ante la autoridad.

Hecho el día 11 de abril de 2026 en [REDACTED], Texas.

[REDACTED]

# **EXHIBIT 6**



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

---

ANGELICA S., ET AL. )  
Plaintiffs, )  
)  
v. ) No. 25-cv-1405 (DLF)  
U.S. DEPARTMENT OF HEALTH AND )  
HUMAN SERVICES, ET AL. )  
Defendants. )  
)  
)  
)  
)  

---

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 16 years old and I am from [REDACTED]. I arrived in the United States in the end of December 2024, when I was 15 years old. I arrived with my older brother who was 17 years old. Our older brother who was an adult already lived in the United States.
3. At first, my brother and I were sent to the same ORR shelter where I am now. Our cousin was our sponsor then, but then my brother turned 18 years old and then he was released. After he was released, she was not my sponsor anymore.
4. Then after he was released, my brother became my sponsor. He had just been released from ORR, so ORR knew everything about him. They knew who he was and they knew we were related because they had our birth certificates, and they had placed us in the same shelter together because we were brothers.
5. But when my brother became my sponsor, there were problems with his application. I think ORR accepted his release paperwork for his identity, but the people he lived with could not provide the required forms of identity documents.

6. They did a home study that was negative. I think it was negative because the people he was living with could not provide the required documentation, but they had not finished moving out yet when the home study was done. So ORR told my brother he had to move in order to be my sponsor, and find a place to live where his household members could and would provide their information to ORR.

7. My brother also did a fingerprint background check, and I think he provided ORR with everything else that they asked for.

8. He has not yet found a place to live where we can live alone the two of us, and he cannot find roommates who can satisfy all these requirements.

9. I have been detained here for more than a year now. It has been a year and three months.

10. It is so hard to be detained for so long. I haven't even seen my brother for a year, since he turned 18 and was released. I miss living with my family so much. I grew up with my brother, and we are so close. When they let him go and kept me here, they took away the person I am closest to in the world. He is my best friend.

11. In the shelter, it's fine because I get food and clothes and a place to sleep, but I am living with strangers. I have made some friends because I have been here for so long, but I want to live with my family who I love. Here, some people come and go. And I never know what is going to happen – we don't know anything about when we will be released and be allowed to start the rest of our lives.

12. Here in the shelter, nothing is good and nothing is bad. It's like being stuck in the middle all the time. It is hard to explain. But it is not right that I have to stay here for so long when I have someone to take care of me who knows me and loves me. I don't know if I can tolerate it much longer.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct.

Executed on this 30th day of March, 2026, in [REDACTED] New York

[REDACTED]

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: March 30, 2026

# **EXHIBIT 7**



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

_____	)	
ANGELICA S., ET AL.	)	
Plaintiffs,	)	
	)	
v.	)	No. 25-cv-1405 (DLF)
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, ET AL.	)	
Defendants.	)	
	)	
_____	)	

**DECLARATION OF [REDACTED]**

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.
2. I am 17 years old and I am from [REDACTED]. I arrived in the United States in January 2025. I entered alone, and was taken to the shelter in Oregon. Now I am at a shelter in Connecticut. I have been detained for about a year and three months.
3. When I first arrived, my mom’s cousin became my sponsor. He lives in Washington. His parents, my great aunt and great uncle, also live in Washington but in a different house.
4. When my cousin began sponsoring me, he had to provide a lot of documents. I don’t remember everything he had to provide. He worked on the sponsorship application for more than a month.
5. Eventually, after a long time my case manager told me that he could not be approved. She said that I needed a different sponsor.
6. I called and asked my great aunt and great uncle if they could sponsor me. But they could not. I think they could not sponsor me because they did not have the required ID documents. I

told my case manager, and she said that because they couldn't sponsor me I had to apply for a long-term foster care placement instead.

7. After a few months, I was accepted to a long-term foster care program, and now I have been here for about four months. I live with a family now. First I met them by phone, and then I went to live with them.

8. I was really sad when I was in the shelter. I didn't want to be there. I wanted to be with my family in Washington. I still miss living with my family.

9. It is different to live with a foster family than with my own family. The food is different than the food I eat with my family. And there is more love and more trust in your own family, even if the family I live with now is very nice. My cousin and my aunt and uncle have the same culture as me. I would be more relaxed with my family. They can understand me better. I should have the right to go live with my family. I don't think just the type of identification someone can provide should be a reason a kid like me cannot live with my family. My family knows me and they know how to take care of me, no matter where their ID documents come from.

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct to the best of my knowledge and belief.

Executed on this 3 day of April, 2026, in Connecticut.



\_\_\_\_\_

**CERTIFICATE OF TRANSLATION**

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Rebecca Wolozin

Date: April 3, 2026

# **EXHIBIT 8**



**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. This declaration is based on my personal knowledge and the following facts are true to the best of my understanding and recollection.

2. I am 17 years old and I am from [REDACTED]. I speak Spanish and some English. I also speak [REDACTED], which is an indigenous dialect in [REDACTED]. I arrived in the United States in the summer of 2023. I arrived by myself, and I went to an ORR shelter in Texas.

3. The first time I was sent to an ORR shelter, I had to stay there for about one and a half months before I was released to go live with my aunt. My aunt had to go through the whole sponsorship process. She provided fingerprints and did all the steps they asked her to do.

4. I was so happy to be released and to go live with her. I lived with her in Louisiana since that time. She took good care of me, and I love her. I lived with her and my two cousins. One is six and the other is an adult now. We all got along well and I miss them a lot. My older cousin grew up with me in [REDACTED] from when we were very little. Then he came here to the United States, and I came later. He and my little cousin are like my brothers. I never thought I would end up back in ORR.

5. My life in Louisiana was good and peaceful. I really like it there. It's also great because there are a lot of Latinos there and we share a culture and we understand each other. I felt welcome and comfortable in our community.

6. My aunt likes to cook, and I like to help her. I'm a good cook. If she was super busy, I would help her finish up with cooking for us. My cousins and I liked to relax and hang out with each other. We liked to play videogames, or go out and play basketball or ride bikes. I also love listening to music. My favorite type of music is Reggeton. I could spend hours just listening to music on my headphones. It makes me so happy.

7. Then, in December a couple weeks before Christmas, I was arrested in Louisiana after I got into a minor car accident. There was no damage as far as I know, but the local police arrested me. After a few days, they sent me to an immigration cell and then here to the ORR shelter in Texas. I don't know why they did not release me to my aunt instead of sending me here far away from my family.

### Re-detention in ORR

8. It has been really hard to be detained again. My aunt tells me that I seem so sad when she talks to me. It's true. I am sad.

9. Also, I had a heart condition when I was a young child. It is a hereditary condition that my dad also had. It went away for a while as I got older, but when I was arrested and detained again in ORR custody, it came back. I started to feel the symptoms again in ORR. My heartbeat was really fast and also irregular. They took me to see a cardiologist but I don't know what the results from the visit were. The cardiologist said that my condition is exacerbated by stress. I feel worried that my symptoms came back after they had been gone for so long.

10. My aunt wanted to sponsor me again, but she could not move forward with the application. They told her she has to start everything over from the beginning and now there are a lot of new requirements. After learning about all the application requirements, my aunt said she could not sponsor me. From what I understand, she does not have the kind of identification that they require—an ID issued by somewhere in the United States. My aunt also asked other family members and friends if they could sponsor me instead, but nobody has the right type of documents ORR is now asking for. I am also afraid my aunt could be detained by immigration if she goes through with the sponsorship process and I don't want to put my family at risk. I never got an explanation of whether ORR even thinks my aunt is not capable of taking care of me anymore. If they would just let me go home, I know she would be happy to receive me.

11. Now, I am trying to go to a foster care program. Or maybe I can get released to a foster home or a shelter when I turn 18. All I know is that I don't want to be here. It's awful being here for a second time.

12. I don't like how everything here just repeats every day. It gets really boring, and then it is really hard to keep my mind off of my worries and thinking about my family. I can distract myself a little bit in class when I'm learning things, but otherwise it's really hard.

13. They don't have that many different options for sports. And I can't listen to music that I choose here. That is so hard. We are allowed to listen to some music, like country music, but not the music I love. I really miss listening to my music.

14. Mostly I think about how much I miss my family, and how much I want to leave. I always ask for updates from my case managers but I just have to keep waiting. I don't know what will happen to me, or when I might be able to go home to my aunt and cousins.

15. I want to help the these other kids too, not just myself. That is why I want to be a class representative in this lawsuit. I think that kids who already have sponsors who were approved in the past by ORR should be allowed to be released to them quickly if they are detained again, without their sponsors having to do the whole sponsorship process over again, especially without any explanation about why they need to do it. If ORR thinks a sponsor did not take good care of a kid, then they should have to explain why and listen to what the kid and their sponsor think.

16. As a class representative, I will think about what all the kids in the same situation as me want. I will do my best so that we all have the chance to go home quickly. I will work with the attorneys to ensure they do what is best for all minors in the case, and I will participate in the lawsuit in whatever way my attorneys and I decide I should. I intend to remain involved in the case and represent the other kids to the best of my ability.

17. I have never served as a class representative in any other case. I am ready to do my best to help kids like me

I declare under my duty to tell the truth and penalty of perjury that all the information I have here given is true and correct.

Executed on this 20th day of February, 2026

[Redacted Signature]

Name: [Redacted]

### CERTIFICATE OF TRANSLATION

My name is Rebecca Wolozin and I swear that I am fluent in both the English and Spanish languages and I translated the foregoing declaration from English to Spanish to the best of my abilities.

Dated: February 20, 2026

Rebecca Wolozin

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ANGELICA S., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:25-cv-1405-DLF
	)	
U.S. DEPARTMENT OF HEALTH AND	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**[PROPOSED] ORDER**

Upon due consideration, Plaintiffs’ Motion for Leave to File Supplemental Memorandum of Points and Authorities Regarding Plaintiffs’ Motion for Class Certification is GRANTED.

Plaintiffs’ Supplemental Memorandum attached as Exhibit A to Plaintiffs’ Motion for Leave to File is deemed filed. Defendants may file a Response to Plaintiffs’ Supplemental Memorandum within 14 days of this order. *See* L.C.v.R. 7(b). Plaintiffs may file a Supplemental Reply within 7 days after filing of Defendants' response. *Id.*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2026.

\_\_\_\_\_  
DABNEY L. FRIEDRICH  
United States District Judge