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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION**

Case No. 2:20-cv-09893-JGB-SHK

IMMIGRANT DEFENDERS LAW  
CENTER, et al.,

*Plaintiffs,*

v.

CHAD WOLF, et al.,

*Defendants.*

**DECLARATION OF AMBER N. QURESHI**

1 I, Amber N. Qureshi, pursuant to 28 U.S.C. § 1746, declare the following is true  
2 and correct:

3 1. I am an attorney at the National Immigration Project of the National  
4 Lawyers Guild. I submit this declaration in support of Plaintiffs’ Emergency Motion  
5 for a Preliminary Injunction and Emergency Motion for Provisional Class  
6 Certification.

7 2. On November 8 and 9, 2020, I went on the Transactional Records Access  
8 Clearinghouse (TRAC) website. TRAC is a “data gathering, data research and data  
9 distribution organization at Syracuse University.” *See* TRAC, *About Us* (last accessed  
10 Nov. 8, 2020), *available at* <https://trac.syr.edu/aboutTRACgeneral.html>. Through its  
11 Immigration Project, TRAC obtains detailed information and data regarding  
12 immigration from the government, checks it for accuracy and completeness, and  
13 publicizes it. *See* TRAC, *About the Project* (last accessed Nov. 8, 2020), *available at*  
14 <https://trac.syr.edu/immigration/about.html>.

15 3. I went on the TRAC website that contains data on the Migrant Protection  
16 Protocols (MPP). *See* TRAC, *Details on MPP (Remain in Mexico) Deportation*  
17 *Proceedings by Hearing Location & Attendance, Representation, Nationality, Month*  
18 *& Year of NTA, Outcome, & Current Status* (Sept. 2020), *available at*  
19 <https://trac.syr.edu/phptools/immigration/mpp/>. I selected “Hearing Location” as the  
20 first dropdown filter and “Outcome” as the second dropdown filter. The San Diego  
21 Immigration Court hears MPP cases from at least two Hearing Locations – the “MPP  
22 Court San Ysidro Port” and the “MPP Court Calexico Port.” TRAC, *Hearing*  
23 *Locations With Addresses and Immigration Court Each Is Under* (last accessed Nov.  
24 8, 2020), *available at* <https://trac.syr.edu/immigration/help/hearingloccode.html>.

25 4. Under “Hearing Location,” I selected the “MPP Court San Ysidro Port,”  
26 and under “Outcome,” I selected “Pending.” The output showed that 2,357 individuals  
27 have pending deportation proceedings before the MPP Court San Ysidro Port. I have  
28 attached as Exhibit A a true and correct copy of the website.

1           5. Under “Hearing Location,” I then selected the “MPP Court Calexico  
2 Port,” and under “Outcome,” I selected “Pending.” The output showed that 1,992  
3 individuals have pending deportation proceedings before the MPP Court Calexico  
4 Port. I have attached as Exhibit B a true and correct copy of the website.

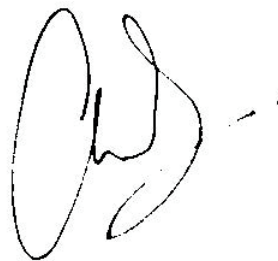
5           6. On the same website containing MPP data, I selected “Represented” as  
6 the first dropdown. The output showed that out of 67,790 individuals subjected to  
7 MPP, 62,822 are or were not represented and 4,968 are or were represented in their  
8 deportation proceedings. I have attached as Exhibit C a true and correct copy of the  
9 website.

10           7. I went on the TRAC website that contains data on Asylum Decisions. *See*  
11 *TRAC, Asylum Decisions by Custody, Representation, Nationality, Location, Month*  
12 *and Year, Outcome and more* (Sept. 2020), *available at*  
13 <https://trac.syr.edu/phptools/immigration/asylum/>. This website contains data on  
14 “each decision granting or denying an asylum application by an Immigration Judge.”  
15 *TRAC, About the Data* (last accessed Nov. 9, 2020), *available at*  
16 [https://trac.syr.edu/phptools/immigration/asylum/about\\_data.html](https://trac.syr.edu/phptools/immigration/asylum/about_data.html). I selected  
17 “Immigration Court” as the first dropdown filter, “Fiscal Year of Decision” as the  
18 second dropdown filter, and “Represented” as the third dropdown filter. Under  
19 “Immigration Court,” I selected “San Diego.” Under “Fiscal Year of Decision,” I  
20 selected “2018.” Fiscal Year 2018 covers cases decided between October 1, 2017  
21 through September 30, 2018. *Id.* The output showed that out of 751 asylum cases  
22 decided from October 1, 2017 through September 30, 2018 by the San Diego  
23 Immigration Court, 679 were represented and 72 were not represented. I have attached  
24 as Exhibit D a true and correct copy of the website.

25  
26 I declare under penalty of perjury that the foregoing is true and correct to the best of  
27 my knowledge.  
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EXECUTED in Silver Spring, Maryland on this 9th day of November, 2020.



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Amber N. Qureshi

# **Exhibit A**



## Details on MPP (Remain in Mexico) Deportation Proceedings

by Hearing Location and Attendance, Representation, Nationality, Month and Year of NTA, Outcome, and Current Status

**About the Data**  
through September 2020

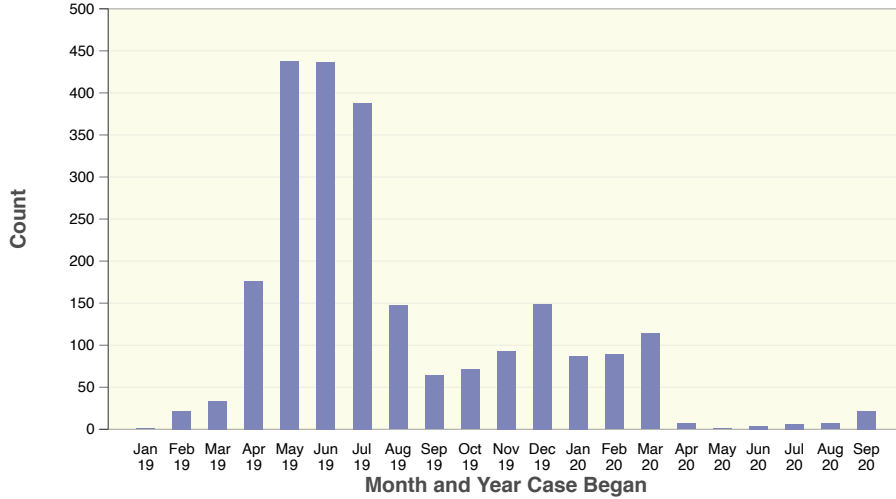
**Measure:**

- Initial Filing
- Current Status

**Graph Time Scale:**

- by Month and Year
- by Fiscal Year

MPP Court San Ysidro Port - Pending



**Time Series:**

- Number
- Percent

Hearing Location ▼  
*click on column headings to sort*

Outcome ▼  
**Hearing Location=MPP Court San Ysidro Port**  
*click on column headings to sort*

Represented ▼  
**Hearing Location=MPP Court San Ysidro Port, Outcome=Pending**  
*click on column headings to sort*

Hearing Location	Total	Outcome	Total	Represented	Total
<a href="#">All</a>	67,790	<a href="#">All</a>	7,698	<a href="#">All</a>	2,357
<a href="#">MPP Court El Paso</a>	21,158	<a href="#">Terminate Proceedings</a>	3,502	<a href="#">Not Represented</a>	2,069
<a href="#">MPP Brownsville Gateway International Bridge</a>	15,884	<a href="#">Pending</a>	2,357	<a href="#">Represented</a>	288
<a href="#">MPP Laredo, Texas - Port of Entry</a>	13,183	<a href="#">Removal Order</a>	1,394		
<a href="#">MPP Court San Ysidro Port</a>	7,698	<a href="#">Other Closure</a>	351		
<a href="#">MPP Court Calexico Port</a>	6,616	<a href="#">Grant Relief</a>	94		
<a href="#">Miami, Florida</a>	349				
<a href="#">El Paso, Texas</a>	301				
<a href="#">New York City, New York</a>	134				
<a href="#">Orlando, Florida</a>	128				
<a href="#">Los Angeles, California</a>	122				
<a href="#">Charlotte</a>	95				
<a href="#">Houston, Texas</a>	93				
<a href="#">Dallas, Texas</a>	93				
<a href="#">Baltimore, Maryland</a>	84				



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# **Exhibit B**



## Details on MPP (Remain in Mexico) Deportation Proceedings

by Hearing Location and Attendance, Representation, Nationality, Month and Year of NTA, Outcome, and Current Status

**About the Data**  
through September 2020

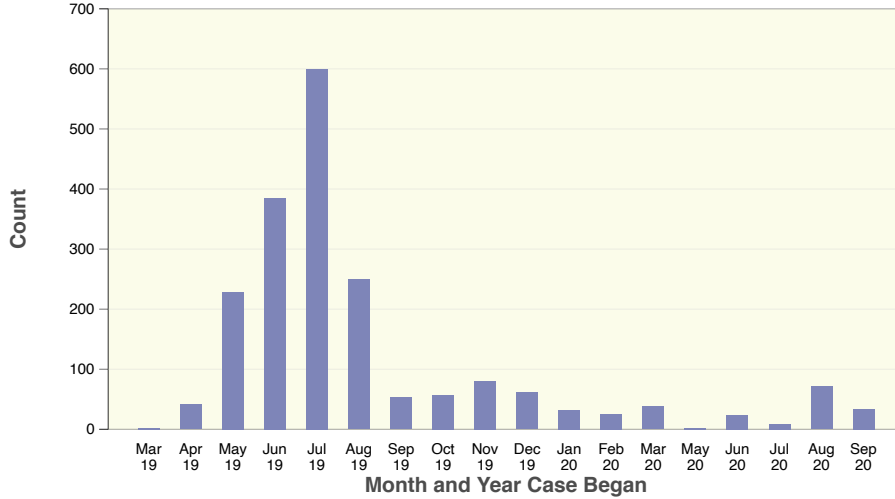
**Measure:**

- Initial Filing
- Current Status

**Graph Time Scale:**

- by Month and Year
- by Fiscal Year

MPP Court Calexico Port - Pending



**Time Series:**

- Number
- Percent

Hearing Location ▼  
*click on column headings to sort*

Outcome ▼  
**Hearing Location=MPP Court Calexico Port**  
*click on column headings to sort*

Represented ▼  
**Hearing Location=MPP Court Calexico Port, Outcome=Pending**  
*click on column headings to sort*

Hearing Location	Total	Outcome	Total	Represented	Total
<a href="#">All</a>	67,790	<a href="#">All</a>	6,616	<a href="#">All</a>	1,992
<a href="#">MPP Court El Paso</a>	21,158	<a href="#">Terminate Proceedings</a>	3,454	<a href="#">Not Represented</a>	1,840
<a href="#">MPP Brownsville Gateway International Bridge</a>	15,884	<a href="#">Pending</a>	1,992	<a href="#">Represented</a>	152
<a href="#">MPP Laredo, Texas - Port of Entry</a>	13,183	<a href="#">Removal Order</a>	831		
<a href="#">MPP Court San Ysidro Port</a>	7,698	<a href="#">Other Closure</a>	316		
<a href="#">MPP Court Calexico Port</a>	6,616	<a href="#">Grant Relief</a>	23		
<a href="#">Miami, Florida</a>	349				
<a href="#">El Paso, Texas</a>	301				
<a href="#">New York City, New York</a>	134				
<a href="#">Orlando, Florida</a>	128				
<a href="#">Los Angeles, California</a>	122				
<a href="#">Charlotte</a>	95				
<a href="#">Houston, Texas</a>	93				
<a href="#">Dallas, Texas</a>	93				
<a href="#">Baltimore, Maryland</a>	84				



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# **Exhibit C**



## Details on MPP (Remain in Mexico) Deportation Proceedings

by Hearing Location and Attendance, Representation, Nationality, Month and Year of NTA, Outcome, and Current Status

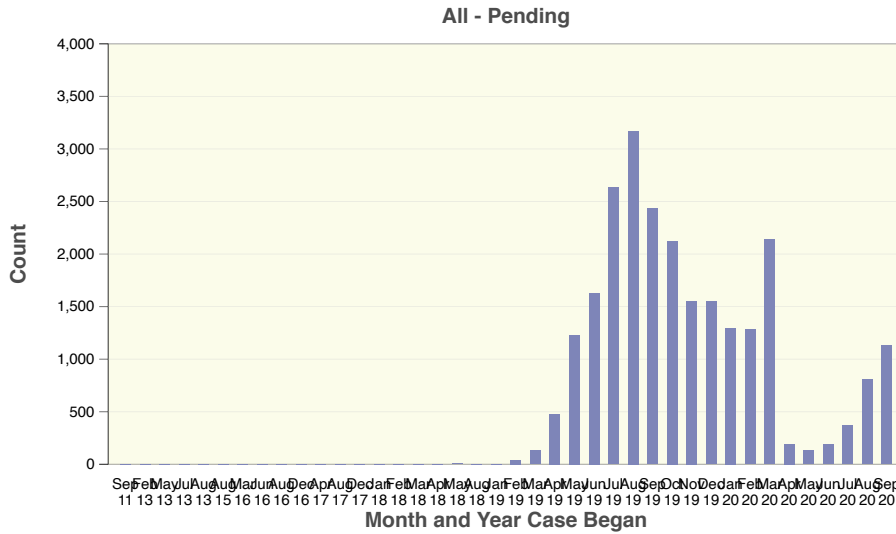
**About the Data**  
through September 2020

**Measure:**

- Initial Filing
- Current Status

**Graph Time Scale:**

- by Month and Year
- by Fiscal Year



**Time Series:**

- Number
- Percent

Represented

*click on column headings to sort*

Outcome

**Represented=All**  
*click on column headings to sort*

Represented

**Represented=All, Outcome=Pending**  
*click on column headings to sort*

	Represented	Total	Outcome	Total	Represented	Total
<a href="#">All</a>		67,790	<a href="#">All</a>	67,790	<a href="#">All</a>	24,540
<a href="#">Not Represented</a>		62,822	<a href="#">Removal Order</a>	32,744	<a href="#">Not Represented</a>	21,059
<a href="#">Represented</a>		4,968	<a href="#">Pending</a>	24,540	<a href="#">Represented</a>	3,481
			<a href="#">Terminate Proceedings</a>	8,196		
			<a href="#">Other Closure</a>	1,693		
			<a href="#">Grant Relief</a>	585		
			<a href="#">Voluntary Departure</a>	32		



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# **Exhibit D**



## Asylum Decisions

by Custody, Representation, Nationality, Location, Month and Year, Outcome and more

8,135 Asylum Applications Disappeared From EOIR Data during FY 2019-2020. [Learn More.](#)

**About the Data**

through September 2020

**Graph Time Scale:**

- by Month and Year
- by Fiscal Year

San Diego - 2018



Time Series:

- Number
- Percent

Immigration Court ▼  
*click on column headings to sort*

Fiscal Year of Decision ▼  
**Immigration Court=San Diego**  
*click on column headings to sort*

Represented ▼  
**Immigration Court=San Diego, Fiscal Year of Decision=2018**  
*click on column headings to sort*

<a href="#">San Francisco</a>	42,092
<a href="#">Houston</a>	20,222 <a href="#">All</a>
<a href="#">Orlando</a>	18,747 <a href="#">2020</a>
<a href="#">Baltimore</a>	18,733 <a href="#">2019</a>
<a href="#">Arlington</a>	16,999 <a href="#">2018</a>
<a href="#">Boston</a>	13,231 <a href="#">2003</a>
<a href="#">Chicago</a>	13,215 <a href="#">2004</a>
<a href="#">Newark</a>	11,717 <a href="#">2009</a>
<a href="#">Seattle</a>	9,765 <a href="#">2002</a>
<a href="#">San Diego</a>	9,622 <a href="#">2008</a>
<a href="#">Philadelphia</a>	9,232 <a href="#">2005</a>
<a href="#">Memphis</a>	7,578 <a href="#">2001</a>
<a href="#">Detroit</a>	7,369 <a href="#">2006</a>
<a href="#">San Antonio</a>	6,633 <a href="#">2017</a>
<a href="#">Miami - Krome</a>	6,616 <a href="#">2010</a>
<a href="#">Dallas</a>	6,579 <a href="#">2007</a>

Fiscal Year of Decision	Total	Represented	Total
	9,622 <a href="#">All</a>		751
	1,088 <a href="#">Represented</a>		679
	972 <a href="#">Not Represented</a>		72
	751		
	607		
	520		
	493		
	481		
	473		
	437		
	431		
	420		
	398		
	373		
	361		



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