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Attorneys for Petitioner

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

M-J-M-A-, an adult,
Petitioner,

v.

CAMILLA WAMSLEY, Seattle Field Office
Director, Immigration and Customs Enforcement
and Removal Operations (“ICE/ERO”); TODD
LYONS, Acting Director of Immigration Customs
Enforcement (“ICE”); U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; KRISTI NOEM,
Secretary of the Department of Homeland Security
(“DHS”); U.S. DEPARTMENT OF HOMELAND
SECURITY; and PAMELA BONDI, Attorney
General of the United States,
Respondents.

Case No. 6:25-cv-02011-MTK

Agency No. XXX-XXX-902

**DECLARATION OF NATALIE
LERNER IN SUPPORT OF
PETITIONER’S MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

Expedited Hearing: November 4, 2025 at
8:00 AM

**DECLARATION OF NATALIE LERNER IN SUPPORT OF PETITIONER'S MOTION
FOR A TEMPORARY RESTRAINING ORDER**

I, Natalie Lerner, upon my personal knowledge, under penalty of perjury declare as follows:

1. My name is Natalie Lerner. I am an attorney licensed by, and a member in good standing of, the Oregon State Bar. I am an attorney with Innovation Law Lab, which is an organization that provides services through the Equity Corps of Oregon ("ECO") universal representation program. I am over the age of eighteen and make this declaration based upon my own personal knowledge.

2. On Thursday, October 30, I became aware of a large number of ICE detentions taking place in and near Woodburn, Oregon. With my colleague, Kelsey Provo, I went to the Portland ICE Office on Macadam Avenue to provide legal orientations, screening, and advice on legal rights to people who were detained and in need of counsel.

3. As a part of this rapid response legal work, I am currently representing Petitioner M-J-M-A- in her immigration case.

4. As detailed in the declaration of my colleague Kelsey Provo, I was able to meet very briefly with M-J-M-A- after her detention the morning of October 30. In the approximately 10 minutes Ms. Provo and I had with M-J-M-A-, we very quickly got her consent to file a writ of habeas corpus on her behalf, as well as basic details about the nature of the arrest and her potential avenues for immigration relief. We learned that she was traveling in a car with other people, on her way to work, in Woodburn. She told us that the car was stopped by immigration agents and that everyone in the car was detained. At no point did immigration agents say M-J-M-A-'s name or ask for her by name, nor did they explain why they were detaining her or provide her with any paperwork or show an arrest warrant. She shared that agents did not identify themselves and that she did not try to escape.

5. As detailed in Ms. Provo's declaration, an ICE officer ended our meeting with M-J-M-A after only a few minutes and denied our request to meet with her for even an additional ten minutes. ICE removed her from our meeting before we were able to complete a full legal screen or advise her of her rights and options in her immigration case. I believed, based on my experience, that she was likely being imminently transported, presumably to the Northwest ICE Processing Center in Tacoma, Washington.

6. Ms. Provo and I found out at 2:09 PM that a no-transfer order had been issued in M-J-M-A-'s case. Ms. Provo went to speak with officers to ascertain whether M-J-M-A- had indeed been transferred or whether she was still in the building.

7. At 4:15 PM, I found out that M-J-M-A- had been transported out of the state at 12:53 PM, and that Innovation Law Lab had filed her habeas petition at 12:45 PM.

8. At that time, a colleague checked the Online ICE Detainee Locator System and confirmed that M-J-M-A- did not appear there. At approximately 8:50 PM, another colleague attempted to schedule a video call with M-J-M-A- through the ERO E-File online system. He was unable to do so and sent me a screenshot showing that the system reflected that M-J-M-A- was not currently in an ICE detention facility. Without knowledge of where she was being detained or her appearance in the ERO E-File online system, I could not schedule a call with her.

9. At 7:51 AM on October 31, one of my colleagues attempted again to schedule a video visit through the ERO E-File system and again M-J-M-A- did not appear in the system. At the same time, another colleague checked the Online Detainee Locator System and sent me a photo indicating that M-J-M-A- was not showing up there either.

10. At 11:13 AM on October 31, after a status hearing in her habeas case, M-J-M-A- appeared in the Online Detainee Locator System, with her location reflected as the Northwest ICE

Processing Center. I was able to log in to the ERO E-File system and attempt to schedule a meeting with M-J-M-A- at approximately 12:05 PM. However, the earliest appointment to speak with her was Sunday, November 2 at 8:00 AM.

11. Because of the hasty nature of M-J-M-A-'s arrest, her disorientation and lack of access to her belongings in ICE custody, the brevity of the time in which we could meet with her, and the lack of clarity for the broader community regarding who had been detained, I have not been able to find a reliable contact number for M-J-M-A-'s family in order to speak with them about her case or to ask them to share my phone number with her so that she can call me from detention. As indicated above, I have also been unable to communicate with M-J-M-A- directly and presumably will not be able to until our scheduled appointment time on Sunday in order to inform her about the developments in her legal case. If I were to travel to the detention center in person – a two and a half hour drive from my office in Portland – I understand, from the experience of my colleagues, that I would face a two to five hour wait to meet with her in person, given the facility's overcrowding, limited attorney rooms, and disorganization.

12. It concerns me deeply that I have not yet been able to speak with her. From my experience and that of my colleagues, ICE will often pressure people in detention to quickly agree to deportation. In my experience, people who have a chance to understand their legal rights and remedies shortly after they are detained are much less likely to give up their rights and more likely to seek relief from deportation, and release from detention, if they are eligible to do so.

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Executed in Portland, Oregon on November 1, 2025.

DECLARATION OF NATALIE LERNER ISO PETITIONER'S MOTION FOR TRO



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