

STEPHEN W. MANNING, OSB No. 013373
stephen@innovationlawlab.org
smanning@ilgrp.com
TESS HELLGREN, OSB No. 191622
tess@innovationlawlab.org
JORDAN CUNNINGS, OSB No. 182928
jordan@innovationlawlab.org
NELLY GARCIA ORJUELA, OSB No. 223308
nelly@innovationlawlab.org
KELSEY PROVO, OSB No. 145107
kelsey@innovationlawlab.org
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200
Portland, OR 97204-1748
Telephone: +1 503-922-3042

Attorneys for Petitioner

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Eugene Division

M-J-M-A- and VICTOR CRUZ GAMEZ,
individually and on behalf of all similarly situated
individuals,

Petitioner and Plaintiffs,

v.

LAURA HERMOSILLO, 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. 25-cv-02011-MTK

**DECLARATION OF JORDAN E.
CUNNINGS IN SUPPORT OF
PLAINTIFFS’ MOTION TO ENFORCE
THE PRELIMINARY INJUNCTION**

I, Jordan E. Cummings, declare pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney licensed to practice in the State of Oregon and am a member in good standing of the bars of the U.S. District Court for the District of Oregon, the U.S. Court of Appeals for the Ninth Circuit, and the Supreme Court of the United States. I am counsel in the above-captioned matter. I submit this declaration in support of Plaintiffs' Motion for Preliminary Injunction and for Provisional Class Certification. I am over 18 years old and have personal knowledge of the facts described herein. If called upon to do so, I could and would competently testify as follows:
2. The Deportation Data Project is a project of attorneys and scholars from UC Berkeley and UCLA that uses publicly available records and those obtained via litigation to analyze immigration enforcement trends. *See* About the Deportation Data Project, <https://deportationdata.org/about.html> (last accessed Sept. 3, 2026). The data available for public review on their website was released on August 21, 2026 and includes immigration enforcement activities that occurred through August 6, 2026. *See* ICE Core Data Codebook, <https://deportationdata.org/docs/ice/codebook.html> (last accessed Sept. 3, 2026).
3. Attached hereto as Exhibit 1 is a true and correct download of a search I completed on the Deportation Data Project's website on September 3, 2026, for the number of ICE administrative arrests in Oregon by month.
4. The download shows a graph of the arrests, but not the precise numbers. The website search reflects the following arrest numbers for each month in 2026 for which data is available: 109 in January, 41 in February, 30 in March, 64 in April, 83 in May, 186 in June, and 174 in July.

Dated: September 3, 2026.

/s/ Jordan Cunnings

JORDAN CUNNINGS, OSB No. 182928
jordan@innovationlawlab.org
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200
Portland, OR 97204-1748
Telephone: +1 503-922-3042

Attorneys for Petitioner