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Attorneys for Petitioner

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

M-J-M-A-; VICTOR CRUZ GAMEZ,
Plaintiffs,

v.

JULIO HERNANDEZ, Seattle Field Office Director, Immigration and Customs Enforcement and Removal Operations ("ICE/ERO"); DAVID VENTURELLA,Acting Director of Immigration Customs Enforcement ("ICE"); U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; MARKWAYNE MULLIN, Secretary of the Department of Homeland Security ("DHS"); U.S. DEPARTMENT OF HOMELAND SECURITY; and TODD BLANCHE, Attorney General of the United States,
Defendants.

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

DECLARATION OF H-D-G-H- IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE

DECLARATION OF H-D-G-H- IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE

I, H-D-G-H-, do declare under penalty of perjury that the following is true and correct to the best of my ability and belief:

1. My name is H-D-G-H-. My date of birth is September 26, 2003. I have lived in Medford, Oregon for about five years, with the exception of around six months in California. I am not married and have no children.

2. I have always worked in construction.

3. On Sunday, July 26, 2026 my friend, M-T-M-, picked me up from my home in Medford at around 6:30am. Our plan was to go fishing at Emigrant Lake, in Ashland, OR.

4. First we went to Walmart to get some supplies. When we were getting ready to leave the Walmart parking lot, M-T-M- said he saw the ICE vehicle and that it turned around and started following us out of the parking lot. When I looked at the vehicle, recognized it because I'd seen the same ICE vehicle arrest someone recently by the airport.

5. The ICE vehicle followed us on the highway all the way to Emigrant Lake, which is about a 30 minute drive. We drove into the park and stopped at the entry gate to pay the fee. Then when we were turning in to the parking area, the ICE vehicle pulled in front and blocked us.

6. The ICE officers went up to M-T-M-'s side first. He had the window down, but they opened his door, undid his seatbelt and pulled him out. He remained silent. They handcuffed him, patted him down and took his wallet and put him in the back seat of the ICE vehicle.

7. Then the other officer came to the passenger side. I got out on my own and they handcuffed me right away. They didn't ask me anything – they took my wallet and phone, which were on the car floor by my feet. They looked and saw my Oregon driver's license and an ID from Guatemala. I did not talk to them. They put me in the back seat next to M-T-M-.

8. Before they got back in the car, we saw one of them move M-T-M-'s car and park it, and take the rear license plate off of M-T-M-'s car. I didn't see what they did with it.

9. They took us to the ICE office in Medford. They interviewed us together and we both remained silent. They took our fingerprints and a DNA swab. They tried to pressure us to agree to self-deport and offered us money. We refused.

10. I asked twice if we could make a phone call to let our families know where we were. They said I could make a call once I was in Tacoma. I understood this to mean once they had taken me to the detention center in Tacoma, Washington.

11. They put us back in the same vehicle, but two different officers were driving. They only gave us water in Medford. In the car on the ride up there was no air conditioning and it was hot but they did not give us any water.

12. When we got to Portland, they said they had to let us go and let us go a few blocks from the office. I understand that a federal judge ordered ICE to release us and that is the only reason we were released.

Signed by me this 7th day of August, 2026.

/s/ H-D-G-H-
H-D-G-H-

CERTIFICATE OF TRANSLATION

I, Stacy Taeuber am competent to interpret between English and Spanish and certify that I have read the contents of this declaration to the Declarant in Spanish. Declarant stated that they understood its contents and verified that they were true and accurate.
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Stacy Taeuber
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8/17/26
Date