

EXHIBIT 56

**Declaration of
I [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED] on behalf of N [REDACTED] S [REDACTED] D [REDACTED]**

I, I [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Guatemala.
2. I entered the United States at Ciudad Juarez with my daughter, N [REDACTED] S [REDACTED] D [REDACTED] who will turn 2 years old on [REDACTED]. I turned myself and my daughter into Border Patrol around June 10, 2019. I fled Guatemala because my husband is in the Guatemalan army and the drug traffickers began recruiting him. They threatened him verbally that if he did not join them, they would kill me and my daughter.
3. Border Patrol took me and my daughter to a place in El Paso that had tents where I stayed with my daughter and about 60 mothers and children. I was there for about 1 day. My daughter had a cough and felt feverish so I asked to see a doctor. I don't know if this person was a doctor or a nurse. They took me to someone who just looked at my daughter and did not conduct an exam. This person said nothing was wrong with my daughter and did not prescribe any medicine.
4. At the El Paso location, we were only given a half cup of oatmeal and a cookie for breakfast, instant soup for lunch, and a juice and cookie for dinner. We were not given any fruit or milk for my daughter. They took our papers but did not allow us to state our case.
5. On Wednesday, we were given a hearing date in November 2019 and sent to Juarez. I was told there was no space in the shelters. I was afraid for my daughter's safety and we had no place to live and nothing to eat there.
6. Because it was unsafe, I crossed the border again and was picked up by Border Patrol. I was brought to Santa Teresa on Saturday, June 15, 2019. I stayed in a tent with about 65 mothers and children.
7. After a few days here, we were moved to a room because about five women had lice and they wanted to fumigate the tent. The room is much worse than the tent. There are about 40 women and children in the room. We have to sleep on the concrete floor, there are no beds or mattresses. Each person only gets an aluminum blanket. The room is very cold because the air conditioner is always on. We are scared to ask the guards to change the temperature. The room is so crowded there is not enough space to lie down. Many of us have to sleep sitting up. The overhead fluorescent lights are always on and it is difficult to sleep.
8. Children are not allowed to go outside. There are no windows in the room and no books or toys to play with. We have to eat our meals in the same place that we sleep, which is unsanitary.
9. For food, we get a burrito with an egg for breakfast. A ham and cheese sandwich for lunch and a dinner burrito with ground beef. N [REDACTED] will eat the egg but doesn't eat the sandwich or dinner. She has lost weight. We are given fruit at lunch which she eats. We are given water that we have to pour into our own bottles that we have to share and reuse. Sometimes the guards are nice and will give us a new bottle. Sometimes they won't. There are two bathrooms with sinks but there is no soap to wash hands inside the

room. The bathrooms have only half walls. There are no showers and we have to use the sink to bathe our children. I had to borrow soap from another woman who brought it with her.

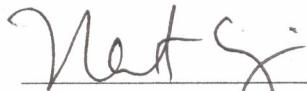
I, I [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

June 19, 2019

L A D P

Certificate of Translation

I, Natasha Quiroga certify that I am fluent in English and Spanish and that I read the above declaration to
I [REDACTED] A [REDACTED] D [REDACTED] P [REDACTED] in Spanish.



Natasha Quiroga
2325 15th St. NW #414
Washington, DC 20009

June 19, 2019

EXHIBIT 57

Declaration of M[REDACTED] O[REDACTED] M[REDACTED] O[REDACTED]

I, M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I came from Ignacio Zaragoza, Mexico. My birthday is [REDACTED] I am 15 years old.

2. My parents live in the United States and I tried to get paperwork from the police so that I could come to be with my parents, but my uncles previously were involved in the black market and so the police would not give me the paperwork, so I had to come to the United States without it because I wanted to come be with my parents. Mexico has become too dangerous. Last year they kidnapped my aunt and uncle and burned his head and hammered his knuckles until they were broken. The police do not protect my family.

3. I arrived in the United States nine days ago. I have been at the Clint Border Patrol Facility for nine days. There are many children here. I have been staying in a room with 25 children. There were no beds, only four mats. We would put two mats together and sleep six children on them. The rest of the children slept right on the ground, including little children. It is concrete. There are babies, as well as older children. They give us two blankets. One to put on the concrete and the other to put over us. There was a two-year-old boy who had been in quarantine because he was sick. There was another girl taking care of him, but she also got sick so when he was released from quarantine, I started to take care of him. I am the third teenage girl who have tried to take care of this little two-year-old boy. His name is E [REDACTED] A [REDACTED] D [REDACTED]. The roster says his A number is [REDACTED] and his date of birth is [REDACTED] I feed him and give him water.

4. I also take care of another little kid. She calls me "Mama." Her name is A [REDACTED] S [REDACTED] C [REDACTED] She is 6 years old. I have been taking care of her for three days. I try to comfort her and help her go to sleep. A [REDACTED] said that she came with her parents and her little sister and they separated her from her parents. Her dad told A [REDACTED] that the guards said that they would bring her to a place that was better for kids. She has been here for three days. According to the roster, her A-number is [REDACTED] and her date of birth is [REDACTED]

5. I, M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

June 17, 2019

M[]O M[]O

Certificate of Translation

I, Kathleen O'Gorman, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] O [REDACTED] M [REDACTED] O [REDACTED] in Spanish.



Kathleen O'Gorman
Illinois Wesleyan University
1312 Park Ave.
Bloomington, IL 61701

June 17, 2019

EXHIBIT 58

Declaration of
M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED], [REDACTED]

I, M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED] ([REDACTED] number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My name is M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED]. I was born on [REDACTED]. I am seventeen years old. I am from El Salvador.
2. On or about June 1, 2019, my mother and I crossed the bridge to enter the United States. We presented ourselves to border patrol agents, who then separated us. They refused to explain why they were doing so. Since that moment, I have not known where my mother is. I have not known if my mother was in the United States or elsewhere, or even if she was alive. I have been extremely worried about her.
3. After they separated us I was taken to a detention center people called "la casita." All the other people detained in the facility were 18 and older. They were all older than me. I was very uncomfortable. I was there for several days.
4. They did not let me make any phone calls there.
5. I was put in a cell with a lot of men, too many to tell. It was way too full and extremely cold. There were no beds, no matts, only the concrete floor. The lights were on all night. There was not enough room for everyone to lie down so I had hunch over while sitting and crumple up in a ball to try to sleep. I barely got any rest or sleep.
6. It was very dirty there. Our cell was filthy. It was never cleaned while I was there. There were toilets and a sink to wash your hands but no soap. I did not have the opportunity to shower there at all.
7. It wasn't long before I got sick with a high fever. However, I didn't get the opportunity to see a doctor until my second day of fever. I was given pills to bring my fever down. I don't what kind of medicine it was.
8. At la casita, food was not given out frequently and I was always hungry. I received food about two times a day. It was always miniature tacos. I didn't ask for more food. I was afraid to ask. I believed the guards wouldn't give me more because of the way I saw them treating other men.
9. I felt really bad there. I was worrying about my mother the whole time.
10. About several days I was transported to the Clint Station by car in the middle of the night. The drive here took about an hour. I was relieved to be out of the first place. The conditions here are better.

11. There is more space here and I am with boys closer to my age. I share a room with many boys. There are no windows. I do not know how many boys there are in my room. There are four boys in my room who are five years old. Here I have a mat and I am able to lay down. I am able to sleep more here because they turn the lights off at night then turn them back on in the morning. It's also not as cold as it was at the casita.
12. I get more food at Clint but I'm still hungry sometimes. It's the same food every day: oatmeal, a cookie, and juice for breakfast; instant ramen soup and juice for lunch; and a burrito, juice, and cookie for dinner. Sometimes the burrito has meat, sometimes it's only beans. There's no milk, fruit, or vegetables here.
13. I haven't seen a doctor since arriving here but I have seen a nurse. I didn't have a chance to bathe in the first location at all. At Clint I have been able to bathe once for two minutes. I have not had a chance to wash my clothing since crossing the border. They have not given me a toothbrush or tooth paste. I've been allowed to brush my teeth three times since crossing the border.
14. Here I've been allowed to go outside for a bit once in the morning and once in the afternoon. Sometimes I'm only allowed outside once a day. When I do get to go outside I play ball with the other kids.
15. To date I have not received any information about my rights under the Flores case. I do not know if there are any social workers or counselors here.
16. Several minutes ago, I had my first opportunity to make a phone call since crossing the border. The legal team from *Flores* who are talking with me today told me that they were able to find my mother and that I would be released to her soon. They arranged for me to call her a few minutes ago. I am so happy that I have finally been able to connect with my mother. I wish I could have been with her the whole time from June 1 through today.

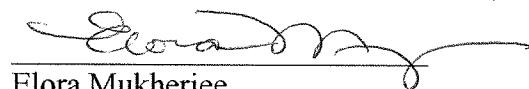
I, M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED], swear under penalty of perjury that the above declaration is true and correct to the best of my abilities. This declaration was provided in English and was read back to me in Spanish, a language in which I am fluent.

M [REDACTED] J [REDACTED] R [REDACTED] R [REDACTED]

June 7 2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] J [REDACTED] R [REDACTED] in Spanish. Executed this 17th of June in Clint, Texas.



Elora Mukherjee
Columbia School of Law
435 W. 116th Street
New York, NY 10025