

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AUSTIN SANCTUARY NETWORK FREE  
IMMIGRATION PROJECT, *et al.*,  
Plaintiffs,

Case No. 20-cv-1686 (LJL)

v.

UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCEMENT, *et al.*,  
Defendants.

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**DECLARATION OF REBECCA SCHECTMAN**

I, Rebecca Schectman, declare pursuant to 28 U.S.C. 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am a law student intern in the Immigrant Rights Clinic of the NYU School of Law, which represents co-Plaintiffs in the above-captioned matter.
2. I submit this declaration in support of Plaintiffs' Cross-Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment (hereinafter, "Plaintiffs' Cross-Motion").

**Summary of Productions to Plaintiffs from Defendant U.S. Immigration and Customs Enforcement**

3. On March 17, 2020, the Court ordered Defendant U.S. Immigration and Customs Enforcement ("ICE") to produce its first set of responsive records in the instant Freedom of Information Act ("FOIA") case by April 27, 2020. On April 22, 2020, Defendant ICE released its first production to Plaintiffs.
4. On May 1, 2020, the Court ordered Defendant ICE to begin processing 1,200 pages per month. Defendant ICE made sixteen productions, releasing 6,574 pages of documents:

3,241 pages withheld in full, 2,183 pages withheld in part with redactions, and 1,150 pages released in full. The last installment of these productions was released to Plaintiffs from Defendant ICE on April 23, 2021.

5. Defendant ICE re-released a small set of reprocessed documents to Plaintiffs on March 10, 2021, October 1, 2021, and January 5, 2022.
6. On January 18, 2022, representatives for Plaintiffs reached out to Defendant ICE through their counsel to inquire whether the final versions of four fully withheld white papers had been produced to Plaintiffs, among other questions. On February 1, 2022, counsel for Defendant responded that a single Deputy Chief of OPLA's Commercial and Administrative Law Division (CALD) searched a single folder on a CALD shared drive where final drafts would have been stored, and did not find final drafts.

**Description of Plaintiffs' Exhibits in Support of Plaintiffs' Cross-Motion**

7. Attached as Exhibit A is a true and correct copy of a chart, Architects of Civil Fines, created by Plaintiffs' counsel. This chart lists 8 entries (and the corresponding Bates numbers) from Defendant ICE's October 29, 2021 Vaughn indexes ("Vaughns"). True and correct copies of the documents listed in this chart are annexed to Exhibit A as Documents A.1.–A.8.
8. Attached as Exhibit B is a true and correct copy of a chart, White Papers and White Paper Correspondence, created by Plaintiffs' counsel. This chart lists 7 entries (and the corresponding Bates numbers) included in Defendant's Vaughns. True and correct copies of the documents referenced in this chart, produced to Plaintiffs by Defendant ICE, are annexed to Exhibit B as Documents B.1.–B.7.

9. Attached as Exhibit C is a true and correct copy of a chart, Media and Congressional Inquiries, created by Plaintiffs' counsel. This chart lists 9 entries (and the corresponding Bates numbers) included in Defendant's Vaughns. True and correct copies of the documents referenced in this chart, produced to Plaintiffs by Defendant ICE, are annexed to Exhibit C as Documents C.1.–C.9.
10. Attached as Exhibit D is a true and correct copy of a chart, Exemption 5 Deliberative Process, Attorney-Client Privilege, and Segregability, created by Plaintiffs' counsel. This chart lists 22 entries (and the corresponding Bates numbers) included in Defendant's Vaughns. True and correct copies of the documents referenced in this chart, produced to Plaintiffs by Defendant ICE, are annexed to Exhibit D as Documents D.1.–D.22.
11. Attached as Exhibit E is a true and correct copy of a chart, Exemption 6 and 7(c) High-level Agency Personnel, created by Plaintiffs' counsel. This chart lists 8 entries (and the corresponding Bates numbers) included in Defendant's Vaughns. True and correct copies of the documents referenced in this chart, produced to Plaintiffs by Defendant ICE, are annexed to Exhibit E as Documents E.1.–E.8.
12. Attached as Exhibit F is a true and correct copy of a chart, Additional Attachments (Not Challenged), created by Plaintiffs' counsel. This chart lists 8 entries (and the corresponding Bates numbers, if any, or whether the document was found in a publicly available source) included in Defendants' Vaughns. Exhibits F.1.–F.3. are available on the Center for Constitutional Rights' webpage. Exhibit F.4. is a document produced by Defendant ICE which is not being challenged by Plaintiffs. Exhibits F.5. and F.6. are publicly available documents published by American Oversight which were obtained through separate FOIA litigation. Exhibit F.7. is a April 9, 2020 email sent from

Plaintiffs' counsel to Defendant ICE's counsel proposing search terms. Exhibit F.8. is an organizational chart which is publicly available on ICE's webpage. True and correct copies of the documents referenced in this chart, produced to Plaintiffs by Defendants, are annexed to Exhibit F as Documents F.1.–F.8.

Dated: New York, NY  
February 4, 2022

  
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Rebecca Schectman