

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

ANGE SAMMA *et al.*, on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
DEFENSE, *et al.*,

Defendants.

No. 20-cv-01104-PLF

**DECLARATION OF SANA MAYAT**

I, Sana Mayat, declare as follows:

1. I am the Nadine Strossen National Security Fellow with the American Civil Liberties Union and one of class counsel in the above-numbered action. I submit this declaration in support of Plaintiffs' Opposition to Defendants' "Motion for Leave of Court to Respond to Plaintiffs' Submission No Later than October 18, 2021."
2. On August 23, 2021, I sent Defendants' counsel, Liam Holland, an email, which attached a letter documenting two new cases of non-compliance with the Court's August 25, 2020 Order and Judgment. Attached as Exhibit 1 is a true and correct copy of that email. Attached as Exhibit 2 is a true and correct copy of the letter attached to the email.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2021

*Sana Mayat*

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Sana Mayat