

Honorable Thomas S. Zilly

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

J.E.F.M., a minor, by and through his Next Friend,  
Bob Ekblad; et al.,

Plaintiffs-Petitioners,

v.

Loretta E. LYNCH, et al.,

Defendants-Respondents,

Case No. 2:14-cv-01026-TSZ

NOTICE OF DEPOSITION TO  
DEFENDANT U.S. DEPARTMENT  
OF JUSTICE

Fed. R. Civ. Proc. 30(b)(6)

~~AA~~  
8/20/15  
4:15pm

NOTICE OF DEPOSITION TO DEFENDANT  
DOJ  
Case No. 2:14-cv-01026-TSZ

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 30(b)(6),  
3 Plaintiff F.L.B. will take the deposition upon oral examination of Respondent U.S. Department  
4 of Justice ("DOJ") commencing at 10:00 AM (EST) on Thursday, September 3, 2015 at the  
5 offices of the American Immigration Council, 1331 G St. NW Suite 200, Washington, D.C.  
6 20005. The deposition will be taken upon oral examination before a notary public or duly  
7 qualified officer, authorized to administer oaths, and will be recorded by the stenographic  
8 method. The deposition will continue from day to day until completed, Saturdays, Sundays, and  
9 holidays excepted.

10 PLEASE TAKE FURTHER NOTICE that DOJ is requested to designate the person or  
11 persons most knowledgeable and prepared to testify on their behalf on the matters set forth  
12 below.

13 PLEASE TAKE FURTHER NOTICE that, pursuant to 6 C.F.R. 5.45(a), Plaintiff  
14 hereby states that he seeks testimony that is reasonably calculated to lead to admissible  
15 evidence relevant to Plaintiff's claims that Defendants are unlawfully denying appointed legal  
16 representation to children in immigration proceedings, in violation of the immigration laws  
17 and/or the Due Process Clause. Topics 1 through 16 seek testimony regarding DOJ's policies,  
18 procedures and practices purportedly used to safeguard the due process rights of pro se children  
19 in immigration proceedings. The information is relevant to the above-captioned matter because  
20 it is reasonably calculated to lead to admissible evidence regarding Plaintiffs' claims; indeed,  
21 Defendants have repeatedly relied on the policies, practices and procedures identified in these  
22 topics in defending this case. In particular, the information is central to legal issues at the heart  
23 of this case, including (among other things): whether, under the framework set forth in  
24 *Mathews v. Eldridge*, 424 U.S. 319 (1976), the use of alternative safeguards is sufficient to  
25 protect the due process rights of children in immigration proceedings without appointing them  
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TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 legal representation; whether Plaintiffs' claims and those of the putative class are likely to be  
2 resolved or mooted before they are resolved on their merits; and whether DOJ's child-  
3 protective procedures are applied uniformly in all cases involving children.

4 Topics 17 and 18 seek information regarding DOJ's policies and practices related to  
5 programs funded by DOJ and ORR, respectively, to provide legal representation to Children in  
6 Immigration Proceedings. The information is relevant to the above-captioned matter because it  
7 is reasonably calculated to lead to admissible evidence regarding Plaintiffs' claims. In  
8 particular, the information is relevant to the likelihood that the claims of the Named Plaintiffs  
9 will be mooted out or resolved before they are resolved on the merits.

#### 10 DEFINITIONS

11 1. For the purposes of this Request, the terms "Child" or "Children" mean any  
12 individual under the age of 18.

13 2. The terms "Concern" or "Concerning" shall mean constituting, evidencing,  
14 memorializing, related to, referring to, pertaining to, reflecting, or otherwise pertaining in any  
15 way, in whole or in part, to the subject matter referred to in the request.

16 3. The terms "Defendant," or "Defendants" refers to Defendants Loretta E. Lynch  
17 and Juan P. Osuna, and any or all subdivisions and their officers, employees, representatives,  
18 attorneys, agents, and/or all persons acting or purporting to act on their behalf, collectively and  
19 individually, including, but not limited to, the "Department of Justice" or "DOJ," and the  
20 "Executive Office for Immigration Review" or "EOIR."

21 4. The terms "Department of Homeland Security" or "DHS" refer to the U.S.  
22 Department of Homeland Security, and any or all subdivisions and their officers, employees,  
23 representatives, attorneys, agents, and/or all persons acting or purporting to act on their behalf,  
24 collectively and individually, including, but not limited to, "Immigration and Customs  
25 Enforcement" or "ICE."  
26

1           5.       The terms "Document" or "Documents" shall have the broadest meaning  
2 permitted by Federal Rule of Civil Procedure 34(a) and shall include any tangible record of  
3 intelligence or information, whether handwritten, typed, printed, or otherwise visually or orally  
4 reproduced, including information stored electronically, on magnetic or optical media, or in  
5 solid state storage devices, notes, drafts, reports, art-work, film or other photo- or video-storage  
6 formats, drawings, graphs, photographs, agreements, letters, World Wide Web or other HTML  
7 pages (whether archived or current), database information, calendar information, and/or any  
8 object or thing that is in possession, custody, or control of Defendant, or to which Defendant  
9 otherwise has access. Any Document that includes any mark that is not a part of the original  
10 text or reproduction thereof and appears on any sheet (front or back), margin, attachment or  
11 enclosure thereof, is to be considered and produced as a separate Document. The term includes  
12 electronic database records maintained by Defendants.

13           6.       For the purposes of this Notice only, the term "Guardian" or "Adult Custodian"  
14 refers to individuals over the age of 18 who are responsible or have assumed responsibility for  
15 the care and custody of a child in Immigration Proceedings, or who are present with a child  
16 during an Immigration Proceeding, regardless of whether DHS or the Office of Refugee  
17 Resettlement released the child into that individual's care and custody and regardless of  
18 whether such individual is responsible for the child's care and custody as a matter of law.<sup>1</sup>

19           7.       The terms "Immigration Proceeding" or "Immigration Proceedings" mean any  
20 proceeding that occurs before an Immigration Judge or the Board of Immigration Appeals,  
21 including, but not limited to, proceedings pursuant to 8 U.S.C. 1229a, 1225(b), 1226(a),  
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25 <sup>1</sup> Because it will assist in interpreting this request, Dismissed Plaintiff G.J.C.P. lives with her  
26 grandmother (Ms. Zelaya) in the United States, but Ms. Zelaya has not adopted G.J.C.P., nor  
obtained legal guardianship over her and therefore is not responsible for G.J.C.P.'s care and  
custody as a matter of law. Nonetheless, she is an Adult Custodian as defined herein.

1 1226(c), 1231(a), 8 C.F.R. 1003.19, and any other Immigration Proceedings ancillary to the  
2 above-mentioned Proceedings that occur before EOIR. See Dkt. 95, ¶7 n.5.

3 8. The term "Named Plaintiffs" shall refer to Plaintiffs and Petitioners J.E.F.M., a  
4 minor, by and through his Next Friend, Bob Ekblad; J.F.M., a minor, by and through his Next  
5 Friend, Bob Ekblad; D.G.F.M., a minor, by and through her Next Friend, Bob Ekblad; F.L.B., a  
6 minor, by and through his Next Friend, Casey Trupin; M.A.M., a minor, by and through his  
7 mother and Next Friend, Rosa Pedro; and J.E.V.G., a minor, by and through his sister and Next  
8 Friend, Santos Angela Vasquez.

9 9. The terms "Office of Refugee Resettlement" or "ORR" refer to the U.S. Office  
10 of Refugee Resettlement, and any or all subdivisions and their officers, employees,  
11 representatives, attorneys, agents, and/or all persons acting or purporting to act on their behalf,  
12 collectively and individually.

13 10. The term "Represented" means having, for the purposes of legal representation  
14 in Immigration Proceedings before an Immigration Judge or the Board of Immigration Appeals,  
15 one of the following:

- 16 a. an attorney who is licensed to practice law and a member in good standing  
17 of the bar of any State, possession, territory, or the District of Columbia, and  
18 is not under any order suspending, enjoining, restraining, disbaring, or  
19 otherwise restricting such person in the practice of law, as defined in 8  
20 C.F.R. 1292.1(a)(1) and 8 C.F.R. 1001.1(f);
- 21 b. an accredited representative, as defined in 8 C.F.R. 1292.1(a)(4) and 8  
22 C.F.R. 1292.2; or
- 23 c. a law student or law graduate of an accredited U.S. law school, who is not  
24 yet admitted to the bar, provided that he or she is appearing at the request of  
25 the person entitled to legal representation and is appearing under the  
26

1 supervision of a licensed attorney, faculty member, or accredited  
2 representative and without remuneration, as defined in 8 C.F.R.  
3 1292.1(a)(2). See Dkt. 95, ¶119 n.23.

4 11. The term “Unrepresented” means lacking, for the purposes of legal  
5 representation in Immigration Proceedings before an Immigration Judge or the Board of  
6 Immigration Appeals, one of the following:

- 7 a. an attorney who is licensed to practice law and a member in good standing  
8 of the bar of any State, possession, territory, or the District of Columbia, and  
9 is not under any order suspending, enjoining, restraining, disbaring, or  
10 otherwise restricting such person in the practice of law, as defined in 8  
11 C.F.R. 1292.1(a)(1) and 8 C.F.R. 1001.1(f);  
12 b. an accredited representative, as defined in 8 C.F.R. 1292.1(a)(4) and 8  
13 C.F.R. 1292.2; or  
14 c. a law student or law graduate of an accredited U.S. law school, who is not  
15 yet admitted to the bar, provided that he or she is appearing at the request of  
16 the person entitled to legal representation and is appearing under the  
17 supervision of a licensed attorney, faculty member, or accredited  
18 representative and without remuneration, as defined in 8 C.F.R.  
19 1292.1(a)(2). See Dkt. 95, ¶119 n.23.

20 12. In construing the topics below and the above definitions, (i) the singular shall  
21 include the plural and the plural shall include the singular; (ii) the conjunctions “and” and “or”  
22 shall be read either disjunctively or conjunctively so as to bring within the scope of the request  
23 below all information that might otherwise be construed to be outside its scope; (iii) the word  
24 “any” shall include, without limitation, “each and every;” and (iv) the word “including” and  
25 “include” are illustrative and do not limit the scope of the request.  
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**TOPICS**

**TOPIC NO. 1:**

Defendants' policies, procedures, practices, training, or guidance, whether formal or informal, Concerning the memorandum titled "Operating Policies and Procedures Memorandum 07-01," issued by the Office of the Chief Immigration Judge on May 22, 2007 ("OPPM 07-01"), available at <http://www.justice.gov/sites/default/files/eoir/legacy/2007/05/22/07-01.pdf>. See Dkt. 135 at 12-13.

**TOPIC NO. 2:**

Defendants' policies, procedures, practices, training, or guidance, whether formal or informal, Concerning an Operating Policy and Procedure Memorandum from the Office of the Chief Immigration Judge, titled "Changes of Venue (OPPM) 01-02."

**TOPIC NO. 3:**

Defendants' policies, procedures, practices, training, or guidance, whether formal or informal, Concerning an Operating Policy and Procedure Memorandum from the Office of the Chief Immigration Judge, titled "Guidelines for Facilitating Pro Bono Legal Services (OPPM) 08-01."

**TOPIC NO. 4:**

Defendants' policies, procedures, practices, training, or guidance, whether formal or informal, Concerning an Operating Policy and Procedure Memorandum from the Office of the Chief Immigration Judge titled "Continuances and Administrative Closure (OPPM) 13-01."

**TOPIC NO. 5:**

Defendants' policies, procedures, practices, training, or guidance, whether formal or informal, Concerning the memorandum titled "Docketing Practices Relating to Unaccompanied Children Cases and Adults with Children Released on Alternatives to Detention Cases in Light

1 of the New Priorities,” issued by the Office of the Chief Immigration Judge on March 24, 2015,  
2 available at [http://www.justice.gov/eoir/pages/attachments/2015/03/26/docketing-practices-](http://www.justice.gov/eoir/pages/attachments/2015/03/26/docketing-practices-related-to-uacs-and-awcatd-march2015.pdf)  
3 [related-to-uacs-and-awcatd-march2015.pdf](http://www.justice.gov/eoir/pages/attachments/2015/03/26/docketing-practices-related-to-uacs-and-awcatd-march2015.pdf) [hereinafter “Docketing Practices Memo”], and the  
4 memorandum titled “Docketing Practices Relating to Unaccompanied Children Cases in Light  
5 of the New Priorities,” issued by the Office of the Chief Immigration Judge on September 10,  
6 2014, available at [http://www.justice.gov/sites/default/files/eoir/legacy/2014/09/30/Docketing-](http://www.justice.gov/sites/default/files/eoir/legacy/2014/09/30/Docketing-Practices-Related-to-UACs-Sept2014.pdf)  
7 [Practices-Related-to-UACs-Sept2014.pdf](http://www.justice.gov/sites/default/files/eoir/legacy/2014/09/30/Docketing-Practices-Related-to-UACs-Sept2014.pdf).

8 **TOPIC NO. 6:**

9 Defendants’ policies, procedures, practices, training, or guidance, whether formal or  
10 informal, Concerning its “Friend of the Court Guidance,” issued by the Office of the Chief  
11 Immigration Judge on September 10, 2014, available at  
12 <http://www.ilw.com/immigrationdaily/news/2014,0911-DOJ.pdf>. See Dkt. 135 at 13.

13 **TOPIC NO. 7:**

14 Defendants’ policies, procedures, practices, training, or guidance, whether formal or  
15 informal, Concerning “Children Entering the United States Unaccompanied, Office of Refugee  
16 Resettlement (January 30, 2015).”

17 **TOPIC NO. 8:**

18 Defendants’ policies, procedures, practices, training, or guidance, whether formal or  
19 informal, Concerning “Unaccompanied Children’s Services, Office of Refugee Resettlement  
20 (August 9, 2012).”

21 **TOPIC NO. 9:**

22 Defendants’ policies, procedures, practices, training, or guidance, whether formal or  
23 informal, Concerning 8 C.F.R. 1240.10(c), which states that “[t]he immigration judge shall not  
24 accept an admission of removability from an unrepresented respondent who is incompetent or  
25 under the age of 18 and is not accompanied by an attorney or legal representative, a near  
26



1 relative, legal guardian, or friend; nor from an officer of an institution in which a respondent is  
2 an inmate or patient." *See* Dkt. 135 at 12.

3 **TOPIC NO. 10:**

4 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
5 informal, Concerning 8 U.S.C. 1158(b)(3)(C), which provides that "[a]n asylum officer (as  
6 defined in section 1225(b)(1)(E) of this title) shall have initial jurisdiction over any asylum  
7 application filed by an unaccompanied alien child (as defined in section 279(g) of title 6),  
8 regardless of whether filed in accordance with this section or section 1225(b) of this title." *See*  
9 Dkt. 135 at 7.

10 **TOPIC NO. 11:**

11 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
12 informal, Concerning parents, Guardians, Adult Custodians, or other non-attorney adults  
13 accompanying Unrepresented Children in immigration court who are permitted to perform  
14 activities including, but not limited to: admitting or denying the Child's removability or any  
15 other charges against the Child; waiving the Child's right to apply for certain forms of relief;  
16 completing and submitting applications for relief; waiving the Child's right to appeal from a  
17 removal order issued by the Immigration Judge; or accepting voluntary departure on behalf of  
18 the Child. *See, e.g.*, Dkt. 135 at 10.

19 **TOPIC NO. 12:**

20 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
21 informal, Concerning EOIR's Legal Orientation Program for Custodians of Unaccompanied  
22 Children. *See* Dkt. 135 at 13 (citing EOIR's Office of Legal Access Programs, Oct. 22 2014,  
23 available at <http://www.justice.gov/eoir/pr/eoir-expands-legalorientation-programs>).

24 **TOPIC NO. 13:**

1 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
2 informal, Concerning "juvenile dockets," "surge dockets," or any other separate or special  
3 docketing or scheduling of cases involving children. See Dkt. 80 at 22.

4 **TOPIC NO. 14:**

5 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
6 informal, Concerning 8 U.S.C. 1232(b)(6), which provides "[t]he Secretary of Health and  
7 Human Services is authorized to appoint independent child advocates for child trafficking  
8 victims and other vulnerable unaccompanied alien children." See Dkt. 80 at 22-23.

9 **TOPIC NO. 16:**

10 All safeguards and initiatives, whether formal or informal, referred to by Defendants in  
11 the following statement: "Congress, the Executive Office of Immigration Review ("EOIR"),  
12 and the Department of Homeland Security ("DHS") have implemented a number of safeguards  
13 and initiatives geared toward protecting the interest [sic] of children appearing in immigration  
14 court," Dkt. 135 at 11-12, and any other policies, procedures, practices, training, or guidance  
15 that Defendants have implemented in order "protect[] the interest[s]" of Children in  
16 Immigration Proceedings.

17 **TOPIC NO. 17:**

18 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
19 informal, Concerning EOIR's partnership with AmeriCorps to "enroll approximately 100  
20 lawyers and paralegals to provide legal services to unaccompanied children." Dkt. 135 at 14  
21 (citing Office of Public Affairs, June 6, 2014, *available at*  
22 [http://www.justice.gov/opa/pr/justice-department-and-cnscsannounce-new-partnership-enhance-](http://www.justice.gov/opa/pr/justice-department-and-cnscsannounce-new-partnership-enhance-immigration-courts-and-provide)  
23 [immigration-courts-and-provide](http://www.justice.gov/opa/pr/justice-department-and-cnscsannounce-new-partnership-enhance-immigration-courts-and-provide)).

24 **TOPIC NO. 18:**

1 Defendants' policies, procedures, practices, training, or guidance, whether formal or  
2 informal, Concerning any other efforts by EOIR or ORR to provide representation to  
3 Unrepresented Children in Immigration Proceedings, including (but not limited to), "the  
4 Department of Health and Human Services[']s award[ of] \$9 million to two grantees to provide  
5 legal services to unaccompanied children with the goal of providing paid counsel to  
6 approximately 2,600 additional unaccompanied children through the completion of their  
7 immigration proceedings." Dkt. 135 at 14.

8 DATED this 18th day of August, 2015.

9  
10 ACLU IMMIGRANTS' RIGHTS PROJECT  
11 ACLU OF SOUTHERN CALIFORNIA

12 By s/ Ahilan Arulanantham

Ahilan Arulanantham (*pro hac vice*)  
13 1313 West 8th Street  
Los Angeles, CA 90017  
14 (213) 977-5211  
(213) 417-2211 (fax)  
15 Email: aarulanantham@aclusocal.org

16 NORTHWEST IMMIGRANT RIGHTS  
17 PROJECT

18 By s/ Matt Adams

Matt Adams, WSBA No. 28287  
Glenda M. Aldana Madrid, WSBA No. 46987  
19 615 2nd Avenue, Suite 400  
Seattle, WA 98104  
20 (206) 957-8611  
(206) 587-4025 (fax)  
21 Email: matt@nwirp.org  
glenda@nwirp.org

22  
23 Theodore J. Angelis, WSBA No. 30300  
Todd Nunn, WSBA No. 23267  
24 Heidi Craig Garcia, WSBA No. 41399  
K&L GATES LLP  
25 925 Fourth Avenue, Suite 2900  
Seattle, WA 98104  
26 Phone: (206) 623-7580

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DOJ - 10

Case No. 2:14-cv-01026-TSZ

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

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Fax: (206) 623-7022  
Email: theo.angelis@klgates.com  
todd.nunn@klgates.com  
heidi.garcia@klgates.com

Cecillia Wang, (*pro hac vice*)  
Stephen Kang, (*pro hac vice*)  
ACLU IMMIGRANTS' RIGHTS PROJECT  
39 Drumm Street  
San Francisco, CA 94111  
(415) 343-0770  
(415) 343-0950 (fax)  
Email: cwang@aclu.org  
skang@aclu.org

Carmen Iguina, (*pro hac vice*)  
ACLU OF SOUTHERN CALIFORNIA  
1313 West 8th Street  
Los Angeles, CA 90017  
(213) 977-5211  
(213) 417-2211 (fax)  
Email: ciguina@aclusocal.org

Kristen Jackson, (*pro hac vice*)  
Talia Inlender, (*pro hac vice*)  
PUBLIC COUNSEL  
610 South Ardmore Avenue  
Los Angeles, CA 90005  
(213) 385-2977  
(213) 385-9089 (fax)  
Email: kjackson@publiccounsel.org  
tinlender@publiccounsel.org

La Rond Baker, WSBA No. 43610  
ACLU OF WASHINGTON FOUNDATION  
901 Fifth Avenue, Suite 630  
Seattle, WA 98164  
(206) 624-2184  
Email: lbaker@aclu-wa.org,

Emily Creighton (*pro hac vice*)  
Kristin Macleod-Ball (*pro hac vice*)  
Melissa Crow (*pro hac vice*)

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AMERICAN IMMIGRATION COUNCIL  
1331 G Street NW, Suite 200  
Washington, DC 20005  
(202) 507-7500  
(202) 742-5619 (fax)  
Email: [ecreighton@immcouncil.org](mailto:ecreighton@immcouncil.org)  
[kmacleod-ball@immcouncil.org](mailto:kmacleod-ball@immcouncil.org)  
[mcrow@immcouncil.org](mailto:mcrow@immcouncil.org)  
  
Attorneys for Plaintiffs-Petitioners

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SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 CERTIFICATE OF SERVICE

2 I certify that on August 20, 2015, I served a copy of the foregoing document by personal  
3 service to counsel for defendants at:

4 **BENJAMIN C. MIZER**  
Principal Deputy Assistant Attorney General

5 **LEON FRESCO**  
6 Deputy Assistant Attorney General

7 **WILLIAM C. PEACHEY**  
8 Director, District Court Section  
Office of Immigration Litigation

9 **WILLIAM C. SILVIS**  
10 Assistant Director

11 **EREZ R. REUVENI**  
12 Senior Litigation Counsel

13 **SARAH S. WILSON**  
14 Trial Attorney

15 **NICOLE N. MURLEY**  
Trial Attorney

16 Civil Division – Office of Immigration Litigation  
17 U.S. Department of Justice  
18 450 Fifth Street, N.W.  
Washington, DC 20530

19  
20  
21 s/ Kristin Macleod-Ball  
Kristin Macleod-Ball

22 Staff Attorney  
23 American Immigration Council  
24 1331 G Street, NW, Suite 200  
Washington, DC 20005-3042  
25 (202) 507-7500  
Email: kmacleod-ball@immcouncil.org  
26

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FACSIMILE: (206) 623-7022