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15 **UNITED STATES DISTRICT COURT**
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 Ms. L., et al.,
18 *Petitioners-Plaintiffs,*
19 v.
20 U.S. Immigration and Customs Enforcement
21 (“ICE”), et al.,
22 *Respondents-Defendants.*

Case No. 18-cv-00428-DMS-MDD
SUPPLEMENTAL
DECLARATION OF MICHELLE
BRANÉ
CLASS ACTION

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1 1. I, Michelle Brané, make the following declaration based on my personal
2 knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that
3 the following is true and correct:

4 2. I am an attorney and the Director of the Migrant Rights and Justice Program at
5 the Women’s Refugee Commission (“WRC”). I have previously submitted
6 declarations in this case.

7 3. The following is based on conversations with officials in the Office of Refugee
8 Resettlement (“ORR”) and lawyers for children of separated parents.

9 4. It is my understanding that ORR has phone numbers for most if not all of the
10 removed parents of children in their custody who are under five years old, and shelter
11 staff has been in touch with the parents, in some cases for purposes of
12 facilitating communication between parents and children.

13 5. It is my understanding that ORR is likely to have phone numbers or some
14 contact information for at least some of the removed parents of the kids who are five
15 years old and above.

16 6. Based on my understanding, parents who were in communication with their
17 children prior to being removed, are likely to reach out and attempt to maintain
18 contact with their children in ORR custody.

19 7. It is also my understanding that the form I-213 may have information that is
20 helpful for locating parents who have been removed. ORR often also has information
21 about other family members or potential sponsors who may have information about
22 how to contact a parent.

23 8. It is my understanding that ICE maintains some record of travel documents
24 used to remove parents and that those documents may contain contact or home
25 address information that would be helpful in contacting parents.
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1 9. I declare under penalty of perjury that the foregoing is true and correct, based
2 on my personal knowledge. Executed in Hyattsville, Maryland, on August 1, 2018.
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7 MICHELLE BRANÉ
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