

1 ERNEST GALVAN – 196065
KARA J. JANSSEN – 274762
2 ADRIENNE SPIEGEL – 330482
LUMA KHABBAZ – 351492
3 ROSEN BIEN
GALVAN & GRUNFELD LLP
4 101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
5 Telephone: (415) 433-6830
Email: egalvan@rbgg.com
6 kjanssen@rbgg.com
aspiegel@rbgg.com
7 lkhabbaz@rbgg.com

8 SUSAN M. BEATY – 324048
CALIFORNIA COLLABORATIVE FOR
9 IMMIGRANT JUSTICE
1999 Harrison Street, Suite 1800
10 Oakland, California 94612-4700
Telephone: (510) 679-3674
11 Email: susan@ccijjustice.org

12 AMARIS MONTES*
Md. Bar No. 2112150205
13 RIGHTS BEHIND BARS
1800 M Street NW Front 1 #33821
14 Washington, D.C. 20033
Telephone: (202) 455-4399
15 Email: amaris@rightsbehindbars.org

16 * Admitted *pro hac vice*

17 Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

21 CALIFORNIA COALITION FOR WOMEN
PRISONERS et al.,

22 Plaintiffs,

23 v.

24 UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS et al.,

25 Defendants.

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STEPHEN S. CHA-KIM*
N.Y. Bar No. 4979357
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, New York 10019-9710
Telephone: (212) 836-8000
Email: stephen.cha-kim@arnoldporter.com

CARSON D. ANDERSON – 317308
ARNOLD & PORTER KAYE SCHOLER LLP
3000 El Camino Real
Five Palo Alto Square, Suite 500
Palo Alto, California 94306-3807
Telephone: (650) 319-4500
Email: carson.anderson@arnoldporter.com

NATALIE STEIERT*
D.C. Bar No. 90010655
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, N.W.
Washington, D.C. 20001-3743
Telephone: (202) 942-5000
Email: natalie.steiert@arnoldporter.com

Case No. 4:23-cv-04155-YGR

**DECLARATION OF SUSAN BEATY
IN SUPPORT OF PLAINTIFFS’
UNOPPOSED MOTION FOR
ATTORNEY’S FEES AND EXPENSES**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Susan Beaty, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am a Senior
3 Attorney at the California Collaborative for Immigrant Justice (“CCIJ”), counsel of record for
4 Plaintiffs. I was previously a Supervising Attorney at Centro Legal de la Raza (“Centro Legal”)
5 during the investigative phase of the case prior to filing, as discussed below.

6 2. I have personal knowledge of the facts set forth herein, and if called as a witness, I
7 could competently so testify. I make this declaration based in support Plaintiffs’ Unopposed
8 Motion for Attorney’s Fees and Costs.

9 **RELEVANT BACKGROUND AND EXPERIENCE**

10 3. I was employed by Centro Legal from September 2018 through June 2023, and
11 have been employed by CCIJ since July 2023.

12 4. CCIJ is a 501(c)(3) non-profit public interest organization that uses coordination,
13 advocacy, and legal services to fight for the liberation of incarcerated immigrants in California.

14 5. CCIJ provides direct representation to immigrants facing detention and deportation,
15 including removal defense before the Executive Office for Immigration Review (EOIR) and
16 federal circuit courts, and *habeas corpus* actions before federal district courts. CCIJ also engages
17 in impact litigation on behalf of clients in immigration detention centers and state and federal
18 prisons to challenge civil rights violations, including unlawful conditions of confinement.

19 6. CCIJ generally represents client or clients who cannot afford to retain a private
20 attorney and litigates cases that other attorneys will not take on. Our clients do not pay for our
21 services. CCIJ regularly co-counsels with private firms to expand our impact, increase litigation
22 resources, and spread the risk of taking on precedent setting class actions in the immigration and
23 detention context.

24 7. CCIJ also coordinates legal services for detained incarcerated immigrants across
25 California. CCIJ conducts legal clinics in immigration detention centers and other carceral
26 settings, providing free legal consultations and referrals, and provides technical assistance and
27 support to immigration and civil rights attorneys across the state.

28 8. During the time I handled this case, CCIJ received multiple requests from

1 individuals and organizations to handle other immigration or detention related cases. Because of
2 the demands of this case, we were forced to turn down or indefinitely defer multiple cases.

3 9. At CCIJ this matter was primarily staffed by me, with support from Supervising
4 Attorney Priya Patel and Senior Paralegal Emily Almendarez. In an effort to minimize fees and to
5 fairly and promptly resolve this matter, I have eliminated the hours of additional CCIJ staff,
6 including Legal Director Lisa Knox and Data Manager Pablo Badra, who each accumulated less
7 than 20 hours of work on this matter.

8 10. Priya Patel is a Supervising Attorney at CCIJ. She graduated from Harvard Law
9 School in 2013, where she served on the Executive Board of the Civil Rights-Civil Liberties Law
10 Review. Ms. Patel previously worked as a Supervising Attorney at Centro Legal from February
11 2019 until July 2023, and at the Capital Area Immigrants' Rights Coalition in Washington, D.C.,
12 and the Immigration Legal Program of Lutheran Social Services in New York City. She has
13 represented hundreds of incarcerated and detained immigrants in deportation and custody
14 proceedings and has litigated numerous cases challenging unlawful conditions in immigration
15 detention.

16 11. Emily Almendarez is a Senior Paralegal at CCIJ. She has worked an immigrants'
17 rights advocate and paralegal since graduating from Yale University in 2010. She currently
18 coordinates legal clinics at multiple immigration detention centers, and supports attorneys
19 representing individual clients in removal and custody proceedings and in impact litigation.

20 12. I have been working in the immigrants' and prisoners' rights fields for two
21 decades. I graduated from the University of California, Berkeley School of Law in 2018, where I
22 received a certification in Public Interest Law and public interest honors. I served as director of
23 Berkeley Law's Prisoner Advocacy Network and Immigrant Rights' Group, and helped to launch
24 both a post-conviction relief clinic for immigrants with criminal records facing deportation, and
25 Berkeley Law's first immigration bond fund. Prior to law school I worked for five years as an
26 prisoners' and immigrants' rights advocate, and for three years as a paralegal at a private
27 immigration defense firm. I received my undergraduate degree from Brown University, where I
28 graduated *summa cum laude*.

1 advocacy with BOP officials for several years around these issues. Beginning around 2021, clinic
2 attendees and clients began sharing reports of egregious and widespread staff sexual abuse at the
3 facility. I met with dozens of survivors of staff abuse to document their experiences, and reported
4 instances of abuse to prison officials and federal law enforcement officials. I cultivated a
5 relationship with the California Coalition for Women Prisoners (CCWP), who began a program to
6 visit and correspond with people at FCI Dublin and ultimately became the organizational plaintiff
7 in this case. I also reached out to numerous law firms about potential litigation against the Bureau
8 of Prisons and Dublin officials, including Rights Behind Bars (“RBB”) and Rosen Bien
9 Galvan & Grunfeld LLP (“RBGG”), who agreed to work up a class action lawsuit. Over the next
10 several months I met with dozens of individuals currently and previously incarcerated at FCI
11 Dublin, raised issues on their behalf, conducted legal research as needed and assisted with drafting
12 pleadings and motions in preparation for filing. After filing I continued to work with co-counsel
13 on all aspects of this case, including legal research and writing, witness testimony and argument
14 before the district court, and negotiation with defendants. I coordinated legal visits at FCI Dublin,
15 and later at facilities across the country, and continued client communication and advocacy around
16 individual client issues.

17 **BILLING PRACTICES IN THIS CASE**

18 18. I am familiar with the billing and timekeeping practices of CCIJ and Centro Legal.
19 Both organizations’ method of recording attorneys’ fees consists of recording time spent on
20 particular cases as contemporaneously as possible with the actual expenditure of time. CCIJ
21 attorneys and paralegals record their time in this manner as a matter of practice.

22 19. I am familiar with the skill and experience of all the timekeepers at CCIJ and
23 Centro Legal who worked on this matter. I reviewed the time entries billed by these timekeepers.

24 20. CCIJ reasonably allocated responsibilities among different timekeepers to assure
25 coordinated and efficient management of the case, with the vast majority of work performed by
26 myself. CCIJ managed the case to avoid duplication of litigation chores, prevent over-staffing any
27 activity associated with the case or engaging in repetitious, otherwise unnecessary, time
28 expenditures. CCIJ and co-counsel appropriately divided tasks amongst the firms to minimize

1 duplication of effort, ensure that resources necessary for the successful prosecution of this case
 2 were available throughout the litigation, and to leverage each firm's relative strengths and
 3 efficiencies.

4 21. CCIJ does not charge its clients fees, as CCIJ represents clients who are currently
 5 detained and incarcerated and generally cannot afford to hire private attorneys. CCIJ handles
 6 impact litigation cases on what is essentially a contingent fee basis, in which we do not charge any
 7 fees to our clients, but rather seek fees at the end of a case under statutory provisions that allow the
 8 prevailing party to recover their reasonable fees and costs when possible. If we are not the
 9 prevailing party, we do not recover any fees.

10 22. Although I believe that my office has performed work on this case efficiently,
 11 effectively, with extreme diligence, and without unnecessary duplication, I have nevertheless
 12 made billing judgment reductions for the purpose of eliminating any duplication, overstaffing, or
 13 overwork. I have personally carefully reviewed the time records of my organization for this
 14 purpose. In addition, my co-counsel Ernest Galvan reviewed CCIJ and Centro Legal's time
 15 entries alongside side of those of the other firms and organizations. Mr. Galvan marked specific
 16 entries for further billing judgment write downs that he suggested to account for any duplication of
 17 effort between organizations, as well as work on projects not directly related and necessary to
 18 prevail in the injunctive part of the case. I reviewed Mr. Galvan's additional write-downs and
 19 approved them.

20 23. For all work performed from October 10, 2018 to March 30, 2025, CCIJ and
 21 Centro Legal's lodestar for 1,974.85 hours of work is \$1,138,491.25. Our hourly rates and hours
 22 would be billed as follows using prevailing market rates:

Timekeeper	Position	Class	Rate	Hours	Total
Susan Beaty	Senior Attorney	2018	\$575	1,879.45	\$1,080,683.75
Priya Patel	Supervising Attorney	2013	\$650	74.90	\$48,685.00
Emily Almendarez	Senior Paralegal		\$445	20.50	\$9,122.50
TOTAL				1,974.85	\$1,138,491.25

24. After CCIJ staff reviewed Mr. Galvan’s suggested additional write-downs, we have reduced the hours claimed. The resulting total hours are shown in the table below:

Timekeeper	Position	Class	Rate	Hours	Total
Susan Beaty	Senior Attorney	2018	\$575	1,870.65	\$1,075,623.75
Priya Patel	Supervising Attorney	2013	\$650	73.90	\$48,035.00
Emily Almendarez	Senior Paralegal		\$445	20.50	\$9,122.50
TOTAL				1,965.05	\$1,132,781.25

25. Since this case falls under the Equal Access to Justice Act, I understand that Plaintiffs’ Counsel’s fees are limited to \$251.84 per person per hour. Under that rate, Centro Legal’s and CCIJ’s fees would total 1965.05 hours times \$251.84, or \$494,878.19.

26. Nonetheless, the Equal Access to Justice Act (EAJA) “authorizes the award of attorney’s fees and other expenses to certain individuals . . . and other entities who prevail against the federal government in judicial proceedings.”¹ It was enacted to “diminish the deterrent effect of seeking review of . . . governmental action” by providing these fees and costs.² The EAJA allows the Court to award market rates for timekeepers with special expertise.

27. Applying market rates to my time, and EAJA rates to all other time, results in the following calculations for Centro Legal and CCIJ:

Timekeeper	Position	Class	Rate	Hours	Total
Susan Beaty	Senior Attorney	2018	\$575	1,870.65	\$1,075,623.75
Priya Patel	Supervising Attorney	2013	\$251.84	73.9	\$18,610.98
Emily Almendarez	Senior Paralegal		\$251.84	20.5	\$5,162.72
TOTAL				1,965.05	\$1,099,397.45

¹ “About the Equal Access to Justice Act (EAJA)”, Administrative Conference of the United States, *available at* [acus.gov/eaja/background](https://www.acus.gov/eaja/background) (last visited Jan. 24, 2025).

² *Id.*

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LITIGATION EXPENSES INCURRED

28. CCIJ and Centro advanced costs and expenses to fund and further the litigation. Attached hereto as **Exhibit B** is a document summarizing the categories of costs and expenses incurred up until March 31, 2025 totaling \$9,768.67.

29. I have reviewed **Exhibit B** and determined that each of the costs and expenses—including amounts for travel, legal visits, and client calls—was appropriately incurred in furtherance of the case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at Oakland, California this 2nd day of February, 2026.

/s/ Susan Beaty

Susan Beaty

EXHIBIT A

SUSAN BEATY

susan@ccijustice.org · 510.679.3674

EDUCATION

University of California, Berkeley School of Law

J.D., May 2018

Honors: Boalt Hall Fellowship (full merit-based scholarship), Pro Bono Honors with Highest Distinction, John Paul Stevens Public Interest Fellowship, Mary C. Dunlap Fellowship, Jurisprudence Prize

Brown University

B.A., *magna cum laude*, History and Latin American Studies, May 2010

PROFESSIONAL QUALIFICATIONS

Admissions: California State Bar (2018)
U.S. Court of Appeals, Ninth Circuit (2021)
U.S. District Court, Northern District of California (2021)
U.S. District Court, Central District of California (2025)

Honors: Kathi Pugh Award for Exceptional Mentorship, Berkeley School of Law (2023)
California Change Lawyers Fellowship (2019-2020)
Equal Justice Works Fellowship (2018-2020)

Affiliations: National Immigration Project, American Immigration Lawyers' Association,
National Lawyers' Guild, National Trans Bar Association

EXPERIENCE

California Collaborative for Immigrant Justice, Oakland, CA

Senior Attorney

June 2023 - Present

Represent incarcerated immigrants in removal and custody proceedings, appeals, and federal litigation. Manage pro se clinics at federal and state prisons. Supervise Berkeley School of Law immigrant legal services project, train and mentor students to represent incarcerated immigrants in administrative proceedings.

Centro Legal de la Raza, Oakland, CA

Supervising Attorney, Immigrants' Rights Project

Jan. 2022 — June 2023

Staff Attorney, Immigrants' Rights Project

Sept. 2018 — Dec. 2021

Represented incarcerated immigrant clients in removal proceedings, appeals, and federal litigation. Managed monthly pro se clinics at detention centers and state and federal prisons. Conducted successful local, state, and federal policy advocacy campaigns. Supervised a team of five attorneys, five legal advocates, and law clerks.

Afghan Network for Advocacy and Resources (ANAR), San Francisco, CA

Founding Co-Director

Aug. 2021 – Aug. 2022

Launched a legal services and advocacy organization to support Afghan refugees following U.S. withdrawal. Recruited, trained, and supervised attorney and student advocates to represent hundreds of Afghan refugees in applications for humanitarian parole. Raised funds, hired staff, built community partnerships.

Berkeley Law Immigrants' Rights Group, Berkeley, CA

Law Student Director

Sept. 2016 – May 2018

Coordinated a legal services project, trained and supported dozens of student advocates. Represented incarcerated immigrants in petitions for release and relief from deportation. Launched the Berkeley Immigration Bond Fund.

East Bay Community Law Center, Berkeley, CA

Student Attorney, Immigration and Clean Slate Programs

Sept. 2016 – May 2018

Helped build a cross-program clinic for immigrants with criminal records at risk of deportation. Conducted intakes, researched and advised on immigration consequences of convictions, represented clients in criminal court in petitions for post-conviction relief and before immigration agencies in applications for relief.

Pangea Legal Services, San Francisco, CA

Law Clerk

Fall 2017

Assisted removal defense attorneys. Conducted intake interviews, conducted legal research, and prepared briefs, motions, and other immigration court filings. Led pro se legal clinics and Know Your Rights trainings.

Legal Aid at Work, San Francisco, CA

Law Clerk, National Origin Program

Summer 2017

Conducted legal research and writing in support of impact litigation for immigrant workers. Staffed national language rights hotline, participated in weekly legal clinics for low-wage workers, and represented clients in administrative hearings. Conducted community Know Your Rights presentations on workplace ICE raids.

Prisoner Advocacy Network, Berkeley, CA

Law Student Advocate

Sept. 2015 – May 2017

Represented people held in long term solitary confinement in California state prisons in administrative proceedings. Conducted research and records review, drafted grievances and appeals, advocated to state agencies.

Sylvia Rivera Law Project, New York, NY

Law Clerk, Prisoner Justice and Immigrant Justice Projects

Summer 2016

Provided civil legal services to low-income transgender incarcerated immigrants. Conducted intakes, provided referrals, prepared name-change petitions and applications for immigration relief, advocated to state and federal agencies. Researched and lobbied on proposed sexual violence prevention regulations for NYC jails.

Bremer Law and Associates, Providence, RI

Senior Immigration Paralegal

Aug. 2013 — Aug. 2015

Managed a caseload of 100-120 clients. Prepared applications, motions, briefs, and other documents. Prepared clients for hearings and interviews. Supervised a staff of two legal secretaries and six paralegals.

Olneyville Neighborhood Association, Providence, RI

Co-Director

July 2012 — Aug. 2015

Lead a grassroots immigrants' rights organization with hundreds of members. Coordinated successful policy campaigns for access to drivers' licenses and limits on police-ICE collaboration. Managed emergency immigration hotline and coordinated monthly community legal clinics. Managed fundraising and finances.

Rhode Island Coalition Against Racial Profiling, Providence, RI

Policy Director

Oct. 2010 — May 2013

Coordinated successful campaigns to pass state and municipal legislation to prevent racial profiling, police brutality, and prison abuse. Developed strategy, drafted legislation, and coordinated community events.

LANGUAGES

Fluent in Spanish and Portuguese

Education

Yale University, New Haven, CT
B.A. in Ethnicity, Race and Migration

May 2020

Work Experience

California Collaborative for Immigrant Justice – Oakland, CA Feb 2024 - *Present*
Paralegal

- Coordinate and facilitate remote and in-person legal clinics in immigration detention centers and federal prisons. Share legal referrals and provide limited scope legal assistance.
- Provide substantive support to attorneys with individual immigration cases and federal lawsuits.
- Organize with community partners and individuals in ICE custody towards the abolition of immigration detention centers in the state of California.

American Civil Liberties Union of Northern California – San Francisco, CA Nov 2023 - Feb 2024
Immigrants' Rights Legal - Policy Assistant

- Assist litigation attorneys with deposition preparation, managing discovery data productions, filing FOIA requests, and document review.
- Conduct remote and follow up intakes with individuals in CDCR and ICE custody for litigation purposes.
- Edit legal citations and confirm their accuracy using Westlaw. Format and file briefs and ancillary documents based on federal, state, and local rules.

Centro Legal de la Raza – Oakland, CA July 2022 - September 2023
Abolishing Immigration Detention (AID) Senior Legal Advocate

- Organized with community partners and individuals in ICE custody towards the abolition of immigration detention centers in the state of California. Organized direct actions, communication strategies, updated campaign websites, drafted press releases, created social media toolkits and calls to action, etc... Collaborated within the Dignity not Detention Coalition, FCI Dublin Prison Solidarity Coalition, and MV/GSA Strike Support Committee.
- Provided support for ongoing litigation surrounding wage/hour theft in ICE custody, as well as rampant staff abuse in BOP custody.
- Prepared ERO Prosecutorial Discretion Requests for individuals in federal prison with ICE detainers. Provided administrative support for UC Berkeley law students in the submission of these requests through their "BIG" program.
- Coordinated remote pro se assistance for individuals in ICE custody. Visited and intaked individuals detained in federal prison.
- Provided substantive support with individual immigration merits cases. This included creating: country conditions evidence, declarations, post release plans, letters of support, and coordinating emergency transportation.

CAIR Coalition – Washington D.C. February 2021 - July 2022
Legal Orientation Provider; Legal Assistant

- Prepared and conducted (remote) detention visits. Intaked people transferred from criminal custody and newly unrepresented individuals.
- Connected with community organizations and individuals' networks of support for case information and post release plans. Composed relief eligibility memos for pro-bono placement.

- Screened and submitted Third Party Notifications for people with medical issues and symptoms. Meticulously logged communications on Salesforce.

Simultaneous Translation – New Haven, CT

October 2016 - December 2020

English/Spanish Interpreter

- Translated documents. Provided simultaneous interpretation for presentations, client evaluations, and conferences hosted by non-profit organizations, such as All Our Kin and United Way.

La Casa Cultural, Yale University – New Haven, CT

August 2017 - May 2020

Peer Liaison (2017); Head Peer Liaison (2019 - 2020)

- Structured and led weekly programming meetings for a staff of 13. Mentored a group of 15 first year students transitioning into an Ivy league education.
- Attended monthly development meetings and created collaborative programming with partners.
- Created term budgets and tracked expenditures.

Central American Resource Center (CARECEN) – Los Angeles, CA

June - July 2019

Survivors of Violence Unit (SVU); Legal Intern

- Supported attorney's casework by helping prepare legal documents and client declarations.
- Logged case details via eImmigration. Translated, organized, edited and prepared legal documents for mailing. Contacted clients for appointments and government organizations for additional information.
- Worked full time and gained specialized skills working with undocumented survivors of violence.

Research

Landfill Health Effects in Tallassee, Alabama; Yale University

January - May 2019

Researcher (1 of 3 members)

- Researched adverse health effects of a private landfill located in the middle of a predominantly, and historically, African American community.
- Used principles of community based participatory research. Designed community training(s) for continuous data collection. Connected with students from Tuskegee University for communal tethering and longevity. Surveyed a total of 122 adults. Installed 4 air monitors for noxious odor detection.

Helminth Infection in School Aged Children - Retalhuleu, Guatemala

June - July 2018

Research Assistant (1 of 4 members)

- Worked with local organizers to create culturally appropriate health questionnaires.
- Conducted interviews with heads of households regarding socio-economic and health conditions of over 500 children.
- Collaborated with various school administrations and collected children's measurements and lab samples. Treated pre-existing helminth infections and collected donations for schools in Retalhuleu.

Community Organizing

MEChA De Yale; Yale University – New Haven

August 2016 - May 2020

Community Action Chair (2017); Co-President (August 2018 - January 2020)

- Programmed events and demonstrations on campus that advocated for undocumented communities.
- Fundraised \$1,000 scholarships granted annually to a local undocumented high school student.
- Organized the 50th Anniversary conference of MEChA at Yale with over 100 alumni in

Coalition for Ethnic Studies at Yale - New Haven, CT

January - May 2019

Lead Organizer

- Mobilized student body in support of Ethnic Studies at Yale.
- Launched op-eds, created physical installations, and organized actions that included alumni.
- Succeeded in obtaining additional resources for Ethnic Studies program, such as hiring power and tenure positions.

Connecticut Students for a Dream

August 2017 - December 2018

Organizer

- Mobilized CT constituents for legislative reforms such as in state tuition.
- Participated in and organized civil disobedience training(s).
- Assisted in presenting materials on liminal legal statuses in state-wide meetings.

Publications and Written Work

Senior Thesis, Yale University – New Haven, CT 2020

“Temporary Protected Status, Veiling of Humanitarianism, and Sites of Purgatorial and Procedural Violence in the United States Immigration System”

SAGE Magazine, Yale University School of Forestry – New Haven, CT 2018

Contributor; 2018 Edition: Degrees of Separation - Collective Resilience in a Changing World

“Mis Papis: [The Accidental Environmentalists]”

Awards and Fellowships

Nakanishi Prize, Yale University – New Haven, CT

May 2020

This award distinguishes “two graduating seniors who have provided exemplary leadership in enhancing race and/or ethnic relations at Yale College during their undergraduate career while maintaining high standards of academic achievement.”

La Casa Cultural Community Outreach Award, Yale University – New Haven, CT May 2020

“This award recognizes a graduating student from the Latinx community who has dedicated countless hours to further developing the relationship between the New Haven community and the larger student body.”

The Critical Innovation Fund, Yale University – New Haven, CT

December 2018

Granted one of five \$1,500 grants “towards addressing pressing immigration challenges in America.”

Howard Topol Grant, Yale University – New Haven, CT

April 2018

Granted \$500 “to support travel to distant sites for independent research, creative projects, organize.”

Language and Software Familiarity

- Spanish (Native Speaker)
- English (Native Speaker)
- French (Beginner)
- Adobe Premiere Pro CC
- Adobe Photoshop
- Canva
- Salesforce (Classic and Lightning)
- Sharepoint

PRIYA ARVIND PATEL

EXPERIENCE

California Collaborative of Immigrant Justice, Oakland, CA

August 2023 - present

Supervising Attorney

Represent detained noncitizens in removal proceedings before the Immigration Courts, Board of Immigration Appeals, U.S. District Courts, and Ninth Circuit Court of Appeals, and in detention conditions-related claims. Conduct intakes and provide legal advice to unrepresented noncitizens at in immigration detention. Support organizing efforts and engage in advocacy on behalf of detained noncitizens in California before state and federal officials and in broader community. Provide mentorship to and conduct trainings for colleagues, law students, and other attorneys representing detained noncitizens throughout California.

Centro Legal de la Raza, Oakland, CA

February 2019 – July 2023

Supervising Attorney, Immigrants' Rights Program, Abolishing Immigration Detention Pod

Represent detained noncitizens before the Immigration Courts, Board of Immigration Appeals, U.S. District Courts, and Ninth Circuit Court of Appeals. Conduct intakes and provide legal advice to unrepresented noncitizens at Mesa Verde Detention Facility and FCI Dublin. Support organizing efforts by noncitizens detained in immigration detention centers in Central California. Engage in advocacy on behalf of detained noncitizens in California before state and federal officials and in broader community. Conduct legislative advocacy. Assist with class actions lawsuits. Directly supervise three immigration attorneys and manage team of eight. Provide technical assistance and conduct trainings for attorneys representing detained noncitizens throughout California. Supervise law students at UC Berkeley in project aiming to stop prison to deportation pipeline.

Capital Area Immigrants' Rights Coalition, Washington, DC

Senior Attorney, Detained Adult Program

August 2018 – December 2018

Staff Attorney, Detained Adult Program

July 2017 – August 2018

Represented detained noncitizens before Immigration Courts in removal proceedings, in bond hearings, asylum and other fear-based protection hearings, and hearings for lawful permanent residency status. Provided legal orientations, information, and *pro se* assistance to detained immigrants. Mentored *pro bono* attorneys on removal defense cases. Supervised legal assistants, legal interns and fellows. Liaised with stakeholders in detention centers, the immigration court, the public defender's office, and with ICE. Provided trainings on various removal defense topics.

Lutheran Social Services of New York, New York, NY

Staff Attorney, Immigration Legal Program

August 2013 – July 2017

Represented low-income noncitizens before the Immigration Courts, Family Courts, United States Citizenship and Immigration Services, the National Visa Center, the Board of Immigration Appeals and the New York State Appellate Court for various immigration relief, including asylum, Special Immigrant Juvenile Status, relief under the Violence Against Women Act, U-visa, cancellation of removal, naturalization, Temporary Protected Status, family-based petitions, and consular processing. Supervised legal fellows, legal interns, paralegals, and *pro bono* attorneys on humanitarian and family-based cases. Liaised with community partners to organize and conduct community education, Know Your Rights presentations, and legal clinics. Wrote grant applications and reports.

Refugio Del Rio Grande, San Benito, TX

Clinical Intern

January 2013

Drafted brief to the Fifth Circuit Court of Appeals for citizenship claim. Researched issues and participated in strategy meetings for ongoing class action. Assisted with applications for Deferred Action for Childhood Arrivals. Observed hearings in federal and immigration court. Lived and worked with attorney supervisor Lisa Brodyaga on her ranch.

National Immigration Project of the National Lawyers Guild, Boston, MA

Clinical Intern

Sept. 2012 – January 2013

Responded to legal inquiries from unrepresented and detained immigrants. Assisted with cases involving Bivens and Federal Tort Claims Act claims against U.S. Customs and Border Protection. Prepared and organized materials for

Immigration Damages Litigation seminar. Researched and drafted practice advisory relating to FTCA actions. Attended in Immigration Damages Litigation seminar in Miami, FL.

Department of Justice, Civil Rights Division, Washington, DC

Legal Intern, Office of Special Counsel for Immigration-Related Unfair Employment Practices June - August 2012
Wrote memoranda on evidence preservation and presentation, jurisdictional requirements, and the scope of 8 U.S.C. § 1324B, the employment discrimination statute enforced by the Office. Investigate and interviewed employers and witnesses to determine whether employer conduct implicates § 1324B. Responded to citizen mail inquiries regarding potential statutory violations.

Greater Boston Legal Services, Boston, MA

Legal Intern, Immigration Unit May - June 2012
Drafted motions to Board of Immigration Appeals, 1st Circuit Court of Appeals, and Immigration Court on behalf of asylum applicants. Conducted interviews and drafted affidavits and statements for asylum applicants and witnesses. Gathered and assembled personal and country condition documentation for asylum applications. Represented individual at asylum hearing.

American Civil Liberties Union of Georgia, Atlanta, GA

Clinical Intern January 2012
Drafted report on racial-profiling and pre-textual traffic stops in Georgia, which was submitted to ICE in a request to not renew 287(g) agreements with Georgia counties.

The Honorable J. Leon Holmes, United States District Court (E.D. Ark)

Summer Law Clerk May - July 2011
Researched issues surrounding motions to dismiss and habeas corpus. Wrote bench memoranda on abstention. Drafted opinions and orders involving civil rights claims. Edited opinions before release.

EDUCATION

Harvard Law School, J.D., May 2013

Activities: *Civil Rights-Civil Liberties Law Review*, Executive Board Vol. 47
Harvard Immigration and Refugee Clinic
Harvard Immigration Project

University of Georgia, B.S. in Psychology, May 2010

Minors in Philosophy, Environmental Law, Religion (*magna cum laude* w/ honors)

PUBLICATIONS

Shahshahani, Azadeh & Priya A. Patel, *From Pelican Bay to Palestine: The Legal Normalization of Force-Feeding Hunger-Strikers*, Michigan Journal of Race and Law, Vol. 24, Issue 1, Nov. 2018

National Immigration Project, *Practice Advisory: Federal Tort Claims Act (Frequently Asked Questions for Immigration Attorneys)*, Jan. 23, 2013

BAR ADMISSION

California State Bar, January 2014

LANGUAGES

Spanish oral and written proficiency
Gujarati oral proficiency

EXHIBIT B

Firm	Date	Cost Desc	Amount	Narrative	Category
CCIJ	3/1/2023	Travel/Lodging	\$680.71	SeaTac legal visits (Feb 2023)	Travel, Lodging, Meals
CCIJ	8/8/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	8/15/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	9/26/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	11/2/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	11/7/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	11/16/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	12/14/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	12/19/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	12/21/2023	Travel/Mileage	\$42.05	FCI Dublin	Travel, Lodging, Meals
CCIJ	1/2/2024	Travel/Mileage	\$39.53	FCI Dublin	Travel, Lodging, Meals
CCIJ	1/3/2024	Travel/Mileage	\$39.53	FCI Dublin	Travel, Lodging, Meals
CCIJ	1/4/2024	Travel/Mileage	\$6.70	Courthouse	Travel, Lodging, Meals
CCIJ	1/5/2024	Travel/Mileage	\$6.70	Courthouse	Travel, Lodging, Meals
CCIJ	1/8/2024	Travel/Mileage	\$6.70	Courthouse	Travel, Lodging, Meals
CCIJ	1/9/2024	Travel/Mileage	\$6.70	Courthouse	Travel, Lodging, Meals
CCIJ	1/17/2024	Travel/Mileage	\$39.53	FCI Dublin	Travel, Lodging, Meals
CCIJ	1/23/2024	Travel/Mileage	\$39.53	FCI Dublin	Travel, Lodging, Meals
CCIJ	1/25/2024	Travel/Mileage	\$39.53	FCI Dublin	Travel, Lodging, Meals
CCIJ	2/14/2024	Travel/Mileage	\$42.88	FCI Dublin	Travel, Lodging, Meals
CCIJ	3/14/2024	Travel/Mileage	\$40.87	FCI Dublin	Travel, Lodging, Meals
CCIJ	3/15/2024	Travel/Mileage	\$6.70	Courthouse	Travel, Lodging, Meals
CCIJ	3/26/2024	Travel/Mileage	\$40.87	FCI Dublin	Travel, Lodging, Meals
CCIJ	3/28/2024	Travel/Mileage	\$40.87	FCI Dublin	Travel, Lodging, Meals
CCIJ	4/17/2024	Travel/Mileage	\$42.88	FCI Dublin	Travel, Lodging, Meals
CCIJ	4/18/2024	Travel/Mileage	\$42.88	FCI Dublin	Travel, Lodging, Meals
CCIJ	4/19/2024	Travel/Mileage	\$42.88	FCI Dublin	Travel, Lodging, Meals
CCIJ	4/22/2024	Travel/Mileage	\$42.88	FCI Dublin	Travel, Lodging, Meals
CCIJ	8/1/2024	Travel/Lodging	\$1,776.10	SeaTac legal visits (July 2024)	Travel, Lodging, Meals
CCIJ	11/1/2024	Travel/Lodging	\$1,291.68	Waseca legal visits (Oct 2024)	Travel, Lodging, Meals
CCIJ	11/1/2024	Travel/Lodging	\$1,978.63	Aliceville legal visits (Oct 2024)	Travel, Lodging, Meals
CCIJ	2/1/2025	Travel/Mileage	\$1,084.48	Danbury legal visits (January 2025)	Travel, Lodging, Meals
CCIJ	3/31/2025	Travel/Mileage	\$2,010.46	Carswell legal visits (March 2025)	Travel, Lodging, Meals

TOTAL \$9,768.67