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19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
21 **WESTERN DIVISION**

22 IMMIGRANT DEFENDERS LAW  
23 CENTER; *et al.*,  
24  
25 Plaintiffs,  
26  
27 v.  
28 U.S. DEPARTMENT OF HOMELAND  
SECURITY; *et al.*,  
Defendants.

Case No. 2:21-cv-00395-FMO-RAO

**DECLARATION OF NATALIA  
TROTTER IN SUPPORT OF  
REPLY ISO PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

Date: June 17, 2021  
Time: 10:00 a.m.  
Ctrm: 6D  
Judge: Hon. Fernando M. Olguin

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*Attorneys for Plaintiffs Immigrant  
Defenders Law Center; Refugee and  
Immigrant Center for Education and  
Legal Services; and The Door*

1 I, **NATALIA TROTTER**, declare under penalty of perjury pursuant to 28  
2 U.S.C. § 1746 that the following is true and correct. I make this declaration based  
3 on personal knowledge and a review of records related to my position as a  
4 Supervising Attorney in the Children’s Program at RAICES:

5 1. I am a Supervising Attorney in the Children’s Program at RAICES. I  
6 am licensed to practice law in the state of Florida.

7 2. On May 19, 2021, a child arrived at BCFS Driscoll, which is an ORR  
8 shelter. She had entered the United States on May 17, 2021 and was designated  
9 unaccompanied. Legal assistants in the office screened the minor and noticed that  
10 she had a pending *in absentia* MPP removal order issued on January 2, 2020. Upon  
11 viewing the removal order, I had to do additional screening and investigation into  
12 the child’s immigration history and the circumstances of her arrival.

13 3. Upon learning of the MPP-*in absentia* removal order, I spoke with ICE  
14 on May 26, 2021, because I knew ICE could deport her to her country of origin  
15 before she had an opportunity to exercise her rights under the TVPRA. The child’s  
16 sole provider was still in Mexico and thus, if ICE were to deport the child, the child  
17 would be sent back to a country where she does not have an adequate caretaker. The  
18 agent I spoke to informed me that ICE was using an initial NTA issued on  
19 September 13, 2019, and thus this child was not a priority for removal. Although  
20 this informal, oral conversation assuaged my immediate sense of urgency, there is  
21 nothing preventing ICE from executing this child’s removal order. Therefore, my  
22 team and I must continue to operate as though this child could be removed pursuant  
23 to that order, without any notice.

24 4. After speaking with the officer, I met with the minor to discuss the  
25 details of her MPP case and her most recent entry and then contacted her mother for  
26 additional information.

27 5. Simultaneously, I, along with other supervisory staff at RAICES, have  
28 been expending extra time and resources to strategize the best path forward for this

1 child as we are concerned that the child’s pending removal order could be executed  
2 at any time.

3 6. Even though I only started working with this child one week ago, my  
4 team and I have expended extensive time on her case due to the threat of summary  
5 removal hanging over this child’s head imposed by her *in absentia* MPP removal  
6 order—far more time than we would spend on a child not subject to MPP and who  
7 had the protections of the TVPRA in place. Despite the wind-down of MPP, we  
8 must continue to act in an emergency, defensive posture and undertake  
9 extraordinary measures continue to protect the rights of this and other MPP-  
10 unaccompanied child clients whom RAICES staff continue to represent and newly  
11 encounter in local ORR shelters.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3<sup>rd</sup> day of June, 2021, in Austin, Texas.

*/s/ Natalia Trotter*  
NATALIA TROTTER