

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

VERNON JONES, MARCKINDAL JULES, LYXON CHERY,
ALDWIN JUNIOR BRATHWAITE, PATRICK MADUABUCHI
NWANKWO, DWEEN ALFAREL BLACKMAN, RICARDO
QUINTANILLA-MEJIA, BRIGHT IDADA FALODUN, PHILIP
DONGA, GAMDUR NARAIN, ERIC C. COMMISSIONG, MD.
ABU MUSA BHUYAN, IBRAHIMA SORY SOW, JUBRIL
ADELAKOUN, JUAN CARLOS LAINEZ MEJIA, CROSWELL
WILSON, JONATHAN ESPINAL-POLANCO, MARVENS
THOMAS, SHANTADEWIE RAHMEE, DANILO
CONCEPCION, OSCAR SALCEDO, CURRY WENDELL
FORBES, and NECATI HARSIT;

Petitioners-Plaintiffs,

v.

CHAD WOLF, in his official capacity as Acting
Secretary, U.S. Department of Homeland Security; THOMAS E.
FEELEY, in his official capacity as Field Office Director, Buffalo
Field Office, U.S. Immigration & Customs Enforcement; and
JEFFREY SEARLS in his official capacity as Administrator,
Buffalo Federal Detention Facility,

Respondents-Defendants.

Case No. 20-cv-361

**DECLARATION OF PROPOSED CLASS REPRESENTATIVE
DIORIS RAMON RIVERA DE LOS SANTOS**

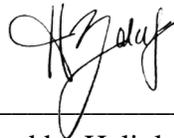
I, DIORIS RAMON RIVERA DE LOS SANTOS, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is DIORIS RAMON RIVERA DE LOS SANTOS. I am currently detained in ICE custody at the Buffalo Federal Detention Facility in Batavia, New York.
2. I am 65 years old. I have diabetes and hypertension. I understand that my age and medical conditions makes me vulnerable to COVID-19, and I want to take all the steps I can to prevent getting it.
3. However, here at the detention center I have been exposed to COVID-19 risks by being forced to live in a multiple-occupancy room, by not having easy access to soap or cleaning

supplies, by being forced to eat meals in rooms with other people, and by being forced to interact regularly with staff who do not wear protective gear. While I understand that the court has ordered the detention center to fix these problems, and I am getting protections as a result of that order, I also understand that this is a temporary order and that if it expires I will be exposed to the same dangers again

4. I think what happened to me is very unfair. I think ICE should make sure that everyone who is vulnerable to COVID-19 is protected from it.
5. I would like to bring this case to help not only myself, but everyone else who is in here. There are a lot of people here in jail who are in the same situation as me. I want to help them as well.
6. I have spoken with my attorneys about what it means to be a class representative, and I am willing to speak up on behalf of other people in my situation. I am willing to participate in whatever is necessary for this class action case, including coming to court or other meetings and staying informed about what is happening in the case. I plan to see this case through regardless of what happens in my immigration case.
7. The Buffalo Federal Detention Facility has canceled all contact visits with people from the outside, including lawyers, so I have given my attorneys permission to sign this document on my behalf.

Dated: May 8, 2020



Signed by Halinka Zolcik, on behalf of
DIORIS RAMON RIVERA DE LOS SANTOS