



documents related to three putative class members. *See* Ex. A (July 20, 2018 (9:51PM) Email from M. Larakers to M. Sewall); *id.* (July 20, 2018 (5:57PM) Email from M. Larakers to M. Sewall); ECF No. 120 at 2.

Respondents produced 834 pages on July 19 and 2,016 pages on July 20. A substantial portion of Respondents' production is redacted for attorney-client, work product, deliberative process, or law enforcement privilege and Respondents have not produced a privilege log identifying the basis for the redactions in their July 20 production. Upon review of the unredacted portions of these documents, Petitioners have not yet identified any substantive information regarding Mr. Brophy or Ms. Adducci's policies or directives regarding the arrest, detention, or removal of class members, or the reasons for the decision to give Lucimar De Souza a June 12, 2018 notice to depart the United States or to withdraw it. Respondents have not sought leave from the Court for an extension of time to meet their obligations, and Petitioners object to this late production in violation of the Court's order.<sup>2</sup>

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<sup>2</sup> In light of the current status, the deposition of Ms. Adducci—originally scheduled for July 24—has been re-scheduled to July 26. Petitioners expect that they may need to seek an extension of the July 27 deadline for completing depositions.

Respectfully submitted this 23rd day of July, 2018.

/s/ Kevin S. Prussia

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2018, a true copy of the foregoing will be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF).

/s/ Kevin S. Prussia

Kevin S. Prussia