

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|-------------------------------|--|---|-------------------|
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| MAUDY ROMELI CONSTANZA LEMUS, | |) | |
| et al. | |) | |
| Plaintiffs, | |) | Civ. No. 20-10009 |
| | |) | |
| v. | |) | |
| | |) | |
| CHAD F. WOLF, et al. | |) | |
| | |) | |
| Defendants. | |) | |
| _____ | |) | |

**AFFIDAVIT OF ADRIANA LAFAILLE SETTING FORTH
REASONS FOR SEALING**

I, Adriana Lafaille, hereby depose and state as follows:

1. I am counsel for Plaintiffs in the above captioned matter.
2. I obtained an affidavit supporting Plaintiffs’ Motion for Preliminary Injunction from an individual who has knowledge of the situation of Central American migrants returned to Nuevo Laredo under the so-called “Migrant Protection Protocols” (the “Affiant”).
3. As laid out in the Affiant’s declaration, the Affiant requested that his affidavit be filed under seal due to threats to his safety and the safety of others. The Affiant also explained that his security situation has worsened significantly over the past week, raising an additional concern about publicly revealing the contents of his affidavit.
4. Plaintiffs also seek leave to redact the dates of Mr. Morales and H.E.M.C.’s court proceedings because that information could be used to locate and target them. Plaintiffs seek to redact both past and future dates because it is possible that scheduling patterns would permit someone who knew prior court dates to predict the date of a future hearing.

Signed under the pains and penalties of perjury, this 22nd day of January, 2020.

/s/ Adriana Lafaille
Adriana Lafaille