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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JHADITH SUZETTE LOPEZ SOLIS,

Petitioner,

v.

KRISTI NOEM, Secretary of the United
States Department of Homeland
Security; PAMELA BONDI, Attorney
General of the United States; JENNIFER
B. HIGGINS, Acting Director of Los
Angeles Field Office, United States
Immigration and Customs Enforcement,
Warden of Adelanto ICE Processing
Center,

Respondents.

Case No. 5:25-CV-03455-CAS-PVC

**SUPPLEMENTAL
DECLARATION OF CARRIE
LEROY**

Honorable Christina A. Snyder
United States District Judge

SUPPLEMENTAL DECLARATION OF CARRIE LEROY

I, Carrie LeRoy, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge:

1. At around 5:00 a.m. this morning (January 29, 2026), a guard at Adelanto Immigration and Customs Enforcement (“ICE”) Processing Center in Adelanto, California (“Adelanto”) informed my detained client Petitioner Jhadith Suzette Lopez Solis (“Ms. Lopez Solis”) that she will be transferred out of the Central District of California today. She inquired as to where she was to be transferred, and the guard stated that he did not know.
2. I immediately emailed Daniel Beck, the U.S. attorney handling this case for Respondents to whom I had provided notice on January 27, 2026 of Ms. Lopez Solis’s intention to seek a temporary restraining order (“TRO”) from this Court at Daniel.Beck@usdoj.gov, asking him to confirm that in response to Ms. Lopez Solis’s TRO filing, Respondents had not made arrangements to transfer Ms. Lopez Solis out of the Central District of California. I have not heard back from Mr. Beck.
3. I believe that Respondents are attempting to avoid responding to Ms. Lopez Solis’s application for a TRO and petition for writ of habeas corpus by transferring her today out of out of the Central District of California or

1 possibly deporting her to Nicaragua in violation of her due process and
2 statutory rights.

3 I declare under penalty of perjury under the laws of the United States of America
4 that the foregoing is true and correct to the best of my knowledge.
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6 Executed on January 29, 2026 in Los Gatos, California.

7 /s/Carrie LeRoy

8 Carrie LeRoy
9 Declarant
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