UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Naveen KUMAR,

Petitioner,

v.

Laura HERMOSILLO, et al.,

Respondents.

Case No. 2:26-cv-389

DECLARATION OF GLENDA M. ALDANA MADRID

I, Glenda M. Aldana Madrid, declare as follows:

1. I submit this declaration in support of Petitioner's petition for writ of habeas corpus. I am over the age of 18, have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently as set forth below.

2. I am a staff attorney with the Northwest Immigrant Rights Project (NWIRP) and counsel of record for the Petitioner. NWIRP obtained the documents below from the Petitioner.

3. Enclosed as Exhibit A is a true and accurate redacted copy of the Form I-213, "Record of Deportable/Inadmissible [Noncitizen]," for Mr. Kumar, dated April 15, 2025.

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Tel. (206) 957-8611

4. Enclosed as Exhibit B is a true and accurate redacted copy of the Order of the Immigration Judge granting Mr. Kumar's application for withholding of removal, dated August 25, 2025.

5. Enclosed as Exhibit C is a true and accurate redacted copy of the Notice of Removal Mr. Kumar received, dated September 2, 2025.

6. Enclosed as Exhibit D is a true and accurate redacted copy of the Third Country Screening Notice Mr. Kumar received, dated November 12, 2025.

7. Enclosed as Exhibit E is a true and accurate redacted copy of the Department of Homeland Security (DHS) Motion to Reopen for Designation of Additional Countries of Removal in Mr. Kumar's case, dated December 12, 2025.

8. Enclosed as Exhibit F is a true and accurate redacted copy of the Order of the Immigration Judge granting DHS's motion, dated January 2, 2026.

9. These documents have been redacted pursuant to Federal Rule of Civil Procedure 5.2.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information is true and correct.

Executed this 3rd of February, 2026.

s/ Glenda M. Aldana Madrid
Glenda M. Aldana Madrid, WSBA No. 46987
NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Suite 400
Seattle, WA 98104
(206) 957-8646
glenda@nwirp.org