UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

L.S.M.
Petitioner,

v.

Kenneth GENALO, New York Field Office Director for U.S. Immigration and Customs Enforcement; Paul ARTETA, Warden of Orange County Correctional Facility; Pamela BONDI, Attorney General of the United States; Kristi NOEM, Secretary of Homeland Security; and Todd M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement,

Respondents.

Civil Action No. 26-CV-00942 (JAV)

SECOND DECLARATION OF [redacted]
IN SUPPORT OF PETITIONER'S MOTION FOR ATTORNEYS' FEES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT

Redacted per ECF No. 5, Order Granting Motion to Seal.

SECOND DECLARATION OF [redacted]

I, [redacted], do declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct to the best of my knowledge and belief:

1. My full name is [redacted].

2. I am a private individual and my net worth does not, nor has it ever exceeded the amount of $2,000,000.

3. I make this declaration in support of my motion for attorney fees and costs incurred in my successful representation before the Southern District of New York in *L.S.M. v. Genalo, et. al*, No. 26-cv-942.

4. I previously retained Mia N. Gonzalez, William E. Craco, Yoon-jee Kim, Faustino Galante, Brian Mucyo, and Monica Lee of O'Melveny & Myers LLP and Alexandra Lampert of Brooklyn Defender Services to represent me pro bono in this case.

5. I authorize the recovery of fees and expenses to my attorneys at O'Melveny & Myers LLP and Brooklyn Defender Services to compensate them for work performed on my behalf which was not compensated.

6. I further assign payment of any award of fees and costs directly to my attorneys.

7. To the best of my knowledge, I do not owe any debt to the United States federal government.

Dated: March 9, 2026
New York, New York

[redacted]