IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALERXI RONDON REYES, Petitioner, v. J.L. JAMISON, et al.; Respondents.	Case No.: 2:26-cv-1324

PETITIONER'S MOTION FOR RECONSIDERATION

Petitioner, Alerxi Rondon Reyes, respectfully requests that this Court grant his motion for reconsideration of this Court's April 09, 2026 Order, ECF No. 15. Specifically, Petitioner requests that the Court reverse its denial of his petition for habeas corpus, and in support thereof avers as follows:

1. In light of new evidence, Petitioner makes this request for reconsideration under Federal Rule of Civil Procedure 60(b)(2), (6) and/or 59. Fed. R. Civ. P. 59, 60.
2. Reconsideration is warranted because of new evidence that confirms that Mr. Rondon Reyes' removal is not reasonably foreseeable and informs the Court's prior analysis.
3. Following the Court's April 9, 2026 decision, Mr. Rondon Reyes obtained three relevant pieces of new evidence.
4. *First,* Mr. Rondon Reyes' counsel contacted his Deportation Office at the ICE Field Office who informed counsel that ICE had no plan for Mr. Rondon Reyes' removal to a third country. *See* Ex. A, Email Correspondence with ICE. Notably, ICE confirmed that it did "not have a travel document" for Mr. Rondon Reyes "to any third country" and had no knowledge that any third country had even been designated. *Id.*

5. *Second*, Mr. Rondon Reyes obtained a letter from the Philadelphia District Attorney's Office (DAO) explaining that it withdrew the charges against Mr. Rondon Reyes for reasons unrelated to his immigration status, but rather because, upon evaluation of the case, the prosecutor's office determined that filing a writ for production of Mr. Rondon Reyes, as they typically would, was not appropriate due to evidentiary concerns. *See* Ex. B, Letter from District Attorney's Office. After reviewing the underlying allegations and discovery, the District Attorney concluded that Mr. Rondon Reyes' medical records—noting chest pain and confusion at the time of the arrest and an assessment of his medical condition at a hospital—presented evidentiary concerns for the DAO. *Id.* This weighed heavily in favor of withdrawing the charges and not pursuing a writ. Though this Court found that it did not have jurisdiction to review ICE's discretionary decision to revoke an OSUP, *see* ECF No. 14 at 14, the DAO Letter informs the Court's analysis of whether Respondents complied with the regulatory and due process requirements when they revoked Mr. Rondon Reyes' OSUP.
6. *Third*, Mr. Rondon Reyes obtained a copy of his medical records from the Federal Detention Center in Philadelphia, showing that his medical conditions—including atrial fibrillation, heart disease, hyperlibidemia, and type 2 diabetes mellitus—have required extensive treatment that is difficult to obtain in detention. *See* Ex. C, Medical Records.[1]
7. This new and previously unavailable evidence warrants the Court's reopening and reconsideration of Mr. Rondon Reyes' habeas petition, ECF No. 1, because the Court's analysis was based upon (1) its belief that ICE could actually remove Mr. Rondon Reyes'

[1] Petitioner will subsequently file a motion to file his medical records under seal or protective order given the highly sensitive personal information contained therein. They are therefore not attached to this motion but will be submitted promptly.

to a third country; and (2) that there was a criminal incident, which gave rise to ICE revoking Mr. Rondon Reyes' OSUP.

8. For the reasons set forth in the accompanying Memorandum of Law, reconsideration is warranted because the new evidence demonstrates that Mr. Rondon Reyes' removal is not reasonably foreseeable, and he has not violated the terms of his OSUP. Because those changes indicate that his removal is not reasonably foreseeable, the Court should reopen his habeas petition and grant his release.

WHEREFORE, Petitioner respectfully requests that his Motion for Reconsideration of the April 09, 2026 Order denying his petitioner for a writ of habeas corpus be granted.

Dated: May 7, 2026

Respectfully Submitted,

/s/Mikaela Wolf-Sorokin

Mikaela Wolf-Sorokin (PA ID 335725)
Lilah Thompson (PA ID 324718)
DEFENDER ASSOCIATION OF PHILADELPHIA
1441 Sansom Street
Philadelphia, PA 19102
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Pro Bono Counsel for Petitioner

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed Motion for Reconsideration and all attachments, except Exhibit C, using the CM/ECF system.

Dated: May 7, 2026

Respectfully submitted,

/s/Mikaela Wolf-Sorokin
Mikaela Wolf-Sorokin (PA ID 335725)
Lilah Thompson (PA ID 324718)
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Pro Bono Counsel for Petitioner

UNITED STATES DISTRICT COURT
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PROPOSED ORDER

Pending before the Court is Petitioner's Motion for Reconsideration. IT IS HEREBY ORDERED that Petitioner's Motion for Reconsideration is GRANTED.

_____

DATED: _____, 2026

EXHIBIT A

Outlook

Third Country Removal Inquiry Rondon-Reyes, Alerxi

From Hosszu, Istvan <Istvan.Hosszu@ice.dhs.gov>
Date Wed 4/15/2026 9:13 AM
To Mikaela L. Wolf-Sorokin <MLWolfSorokin@philadefender.org>

You don't often get email from istvan.hosszu@ice.dhs.gov. Learn why this is important

This email originated from outside of the Defender Association. Do not click links or open attachments unless you recognize the sender (*verify email address*) and know the content is safe.

Good morning,

1. What country is ICE pursuing third country removal to? – I do not know what third country has been designated at this time.
2. Have you obtained travel documents for that country? – I do not have a travel document to any third country at this time
3. Who is assigned deportation officer? – I am the assigned case officer.

4. Do you need anything from Mr. Rondon Reyes? – Mr. Rondon can assist in his removal by providing me with a travel document to what ever country he wishes to go to and one that is willing to issue him one.

Thank you

Istvan Hosszu Jr
Deportation Officer
Philadelphia Field Office, York, Sub-Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Cell: 215-239-5302
Desk: 717-767-7520

Outlook

Third Country Removal Inquiry

From Mikaela L. Wolf-Sorokin <MLWolfSorokin@philadefender.org>
Date Mon 4/13/2026 5:12 PM
To ICE Philadelphia <philadelphia.outreach@ice.dhs.gov>

To whom it may concern,

I represent Alerxi Rondon Reyes ([redacted]) who was granted deferral of removal under the Convention Against Torture on September 20, 2023, and accordingly, cannot be removed to the Dominican Republic. I understand that Mr. Rondon Reyes is being processed for third country removal. Can you please share the following information:

1. What country is ICE pursuing third country removal to?
2. Have you obtained travel documents for that country?
3. Who is assigned deportation officer?
4. Do you need anything from Mr. Rondon Reyes?

Please advise by no later than Thursday 4/16.

Thank you.

Mikaela

Mikaela Wolf-Sorokin | Immigration Attorney, Community Defense Unit | (she, her)
PHONE: 267-765-6789 | EMAIL: MLWolfSorokin@philadefender.org
WWW.PHILADEFENDER.ORG | SUPPORT IMMIGRATION DEFENSE!



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EXHIBIT B

DAO

Philadelphia District Attorney's Office

April 21, 2026

RE: Raymondo Vargas (DOB [redacted])
MC-51-CR-0022747-2025
Alias: Alerxi Rondon

Your Honor,

I am writing to provide additional information regarding **MC-51-CR-0022747-2025.** Here, Mr. Vargas was charged with driving under the influence, simple assault, recklessly endangering another person, false identification to law enforcement, and criminal mischief stemming from an arrest on December 6, 2025.

Mr. Vargas was scheduled to appear at the Criminal Justice Center in this matter on February 27, 2026. Unbeknownst to our Office, he was arrested and detained by ICE on the same day.

In general, when federal immigration officials arrest and detain a Defendant with pending criminal matter(s) before the Philadelphia Municipal or Common Pleas Courts, it is the practice of the Philadelphia District Attorney's Office (DAO) to file a writ with ICE to have them returned to Philadelphia for the remainder of their criminal matter(s). However, in each instance, we undertake a complete review of the case to assess the Defendant's history and the likelihood of a successful prosecution, including the evidence against the Defendant, before filing the writ.

After such a review, it was determined that filing a writ for Mr. Vargas was not appropriate. This decision was led by a review of the underlying allegations and of relevant discovery in this case. The Philadelphia Police responded to the scene of an auto accident on Dec. 5, 2025. Medics were already onsite and pointed out to Police that Mr. Vargas appeared intoxicated and refused medical treatment. Mr. Vargas also refused a blood alcohol test. He was transported to Episcopal Hospital for evaluation. Hospital records show that Mr. Vargas was treated for diabetes, high blood pressure and plaque buildup in the main artery. He complained of chest pain and confusion.

Larry Krasner, District Attorney
Three South Penn Square
Philadelphia, PA 19107-3499
(215)-686-8000
www.phillyDA.org

Mr. Vargas's medical records presented evidentiary concerns for the DAO, weighing heavily in favor of withdrawing the charges/not pursuing a writ for the Defendant. Based on this decision, our Office did not oppose the Defense's motion to relist the matter and withdraw the case on March 5, 2026.

If the court has additional questions regarding this matter, please do not hesitate to reach out. I am available by phone at 215-686-9936 or email at stephanie.costa@phila.gov.

Respectfully,

Stephanie Costa

Stephanie Costa-Kelser
Assistant District Attorney

EXHIBIT

U.S. Citizenship and Immigration Services

Applicant: **ALERXI RONDON-REYES**
A #: [redacted]

Officer: **Gardy Jacques**
Date of Determination: **Jun 14, 2023**

Reasonable Fear Determination Checklist and Written Analysis

Country
DOMINICAN REPUBLIC

Jurisdiction
Reinstatement of a Prior Order under INA §241(a)(5)

DECISION

Reasonable Fear Determination
Positive

HARM

Has the applicant testified that he or she has experienced past harm in his or her country?
Yes

Harm:
[redacted]

Entities:
[redacted]

Has the applicant testified that he or she fears future harm if returned to his or her country?
Yes

Harm:
Death

Entities:
[redacted]

CREDIBILITY

Was the applicant's testimony credible?
Yes

ANALYSIS

THE APPLICANT HAS ESTABLISHED:

☒ A reasonable possibility of future torture

Torture Written Analysis

There is a reasonable possibility that the applicant can establish past or future torture.

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Past Torture: The harm suffered by the applicant constituted severe physical and mental suffering. He testified that [redacted].

[redacted]

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USDOS – US Department of State: 2022 Country Report on Human Rights Practices: Dominican Republic, 20 March 2023 https://www.ecoi.net/en/document/2089234.html (accessed on 14 June 2023).

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EXHIBIT E

Expert Affidavit of Professor Sarah Paoletti Regarding the Convention Against Torture (CAT)

I, Sarah Paoletti, do hereby declare under the penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. The facts set forth in this affidavit are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare the facts stated herein.

2. I am a Practice Professor of Law and the Director of the Transnational Legal Clinic ("Clinic") at the University of Pennsylvania Carey Law School, which I founded in 2006. Students in the Clinic gain training and mentorship, under my supervision, in the practice of law through direct representation of individuals in all forms of humanitarian immigration relief, while also engaging in legal advocacy that requires them to engage with the international treaties and legal norms and systems that operate at the intersection of migration and human rights.

3. As a Clinic Supervisor and as Primary Counsel of Record, I have also submitted briefs of amici curiae on behalf of international human rights and refugee rights scholars, practitioners and experts to the U.S. Courts of Appeals for the 1st, 2nd, 3rd, 4th, and 9th Circuits, as well as the U.S. Supreme Court, addressing the underlying international human rights law and obligations applicable to the United States in the context of immigration enforcement. Several of those briefs have specifically addressed U.S. international legal obligations, codified and recognized in U.S. law, to guarantee the right to non-refoulement (right of "non return"), relying specifically on obligations contained within the 1967 Protocol Relating to the Status of Refugees (which incorporates by reference the UN Refugee Convention), and the UN Convention Against Torture.

4. I received my Bachelor of Arts from Yale University, and graduated *summa cum laude* from American University Washington College of Law. In addition to my admission to the above referenced Circuit Courts, I am a member of good standing in the Bars of Pennsylvania, New Jersey, and the District of Columbia, and am admitted to practice in the U.S. District Courts of the Eastern and Western District of Pennsylvania.

Overview of Fear Based Protection in the United States

5. The United States has three primary types of fear-based protections available to noncitizens in the United States to comply with international treaties preventing *refoulment* of noncitizens to countries where they would be persecuted or tortured.

6. The first form of protection is asylum. Asylum is a discretionary form of immigration relief that can be granted to noncitizens who meet the definition of a "refugee," as defined in the UN Refugee Convention. A "refugee" is defined as someone who is found outside of their country of nationality, in this case who are present in the United States, and who are unable to return to their home countries because of past persecution or a well-founded-fear of

future persecution based on one of five statutorily defined protected grounds (race, religion, nationality, membership in a particular social group, or political opinion). Because asylum affords individuals the right to apply to become Lawful Permanent Residents after one year of physical presence in the United States, and then later to apply for citizenship in the United States, it is viewed as a "discretionary" form of relief, permitting Congress to introduce certain statutory restrictions as to eligibility (such as a one-year filing deadline). Individuals may apply both affirmatively – in that they present themselves to U.S. Citizenship and Immigration Services without first having been placed into removal proceedings and affirmatively ask for asylum. Persons in removal proceedings may also apply for asylum, and that is done through what is known as a "defensive" application for asylum. The same legal requirements are present for those who apply affirmatively as apply to those who apply defensively, and the same benefits post-grant of asylum similarly accrue.

7. The second form of protection is Withholding of Removal. Withholding of Removal is a mandatory form of relief that applies to individuals who satisfy the definition of a refugee, set out above, but who are excluded from asylum protection because they are subject to one of the statutorily defined discretionary bars. To receive the protection of Withholding, an individual must show it is "more likely than not" (a greater than 50 percent chance) that they have a well-founded fear of future persecution on account of one of the five enumerated protected categories. Withholding of Removal is the codification in U.S. law of our non-refoulement obligations under the 1967 Protocol on the Status of Refugees, as discussed below. Unlike asylum, withholding of removal may not be denied as a matter of discretion. Withholding of removal prevents removal to any single country of fear and does not grant benefits such as a pathway to permanent citizenship or derivative withholding for a spouse or child.

8. Relief under the UN Convention Against Torture (CAT), in the form of "deferral of removal," and represents the third form of protection available to noncitizens who fear torture if removed to their country of nationality. Unlike asylum and withholding of removal, relief under CAT does not require that the noncitizen demonstrate nexus between the feared harm and a protected ground. As discussed below, deferral of removal originated with U.S. obligations under the UN Convention Against Torture to guarantee the right of non-refoulment of persons to a country where it is more likely than not that they will face torture. Like withholding of removal, deferral of removal under the CAT is mandatory and cannot be denied in the exercise of discretion.

9. Each of these forms of protection, if granted, prohibits an individual's deportation to his or her country of origin. It does not necessarily provide a pathway to citizenship or permanent status in the United States. However, individuals granted CAT have traditionally remained in the United States indefinitely, sometimes – though not always – while subject to an "order of supervision."

10. Individuals granted CAT or withholding of removal are entitled to apply for other forms of immigration relief, if applicable, such as U-Visas, for victims of crimes; T visas, for victims of trafficking, or family-based immigration applications.

History of the Convention Against Torture

11. On December 10, 1984, the United Nations General Assembly unanimously adopted the Convention Against Torture. *See* G.A. Res. 39/46, 39 U.N. GAOR Supp. (No. 51) at 197 U.N. Doc. A/39/51 (1984) (Dec. 10, 1984).

12. Though the United States played an active role in drafting the Convention, its ratification by the United States was prolonged from the 1970s until 1999 when the Executive Branch promulgated regulations for CAT. *See* Regulations Concerning the Convention Against Torture, 64 Fed. Reg. 8478 (Feb. 19, 1999) (to be codified at 8 C.F.R. pt. 3, 103, 208, 235, 238, 240, 241, 253, 507).

13. The United States Senate gave its advice and consent for ratification of the UN Convention Against Torture in 1990, 136 CONG. REC. 36192 (1990), but did not transmit its instrument of ratification until October 1994, when new federal criminal provisions addressing torture, *see* 18 U.S.C. § 2340, took effect. Then in 1998, Congress passed legislation to implement the United States' obligations under the Convention Against Torture through the Foreign Affairs Reform and Restructuring Act (FARRA). Pub. L. 105-277, Div., G., Title XXII. § 2242, 112 Stat. 2681-822 (codified as note to 8 U.S.C. § 1231). The Act explained that "[i]t shall be the policy of the United States not to expel, extradite, or otherwise effect the involuntary return of any person to a country in which there are substantial grounds for believing the person would be in danger of being subjected to torture," *id.* at § 2242(a), and it directed "the heads of the appropriate agencies" to "prescribe regulations to implement the obligations of the United States" under Article 3 of the Convention Against Torture, *id.* at. § 2242(b).

14. As a State Party to the Convention Against Torture, the United States is bound by the definition of torture in Article 1 and the obligation under Article 3 not to return (*refouler*) a migrant to a country where there are substantial grounds for believing he or she would be subjected to torture. *See* Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. art. 1, 3, Dec. 10, 1984, 1465 U.N.T.S. 113, 113-114.

15. Because of the universal condemnation of torture, there are no exceptions to CAT's prohibitions, not even where an individual has a serious criminal conviction. *See* 8 C.F.R. § 1208.17 (2019); *Aksoy v. Turkey*, 23 Eur. H.R. Rep. 553, 585 (1996) ("Article 3 makes no provision for exceptions and no derogation from it is permissible . . . even in the event of a public emergency threatening the life of a nation."); *see also, e.g.*, *Moncrieffe v. Holder*, 569 U.S. 184, 187 n. 1 (2013) (noting that "[a] conviction of an aggravated felony has no effect on CAT eligibility").

The Right to *Non-Refoulment* Is a Binding Principle of International Law

16. The principle of *non-refoulement* is embodied in Article 33(1) of the 1951 Refugee Convention and the 1967 Protocol Relating to the Status of Refugees. Article 33(1) affirms: "No Contracting State shall expel or return ('refouler') a refugee in any manner whatsoever

to the frontiers of territories where his life or freedom would be threatened on account of his race, religion, nationality, membership of a particular social group or political opinion." United Nations Convention Relating to the Status of Refugees art. 33(1), July 28, 1951, 189 U.N.T.S. 150 [hereinafter Convention]. The Executive Committee of the United Nations High Commissioner for Refugees ("UNHCR"), comprised of States that include the United States, has clarified that the principle of *non-refoulement* applies to asylum-seekers "irrespective of whether or not they have been formally recognized as refugees." UNHCR, Executive Comm., *Conclusions Adopted by the Executive Committee on the International Protection of Refugees*, No. 6 (XXVIII) (Oct. 12, 1977), available at https://www.unhcr.org/en-us/578371524.pdf.

17. The principle of *non-refoulement* is also found in the Convention Against Torture, which states that "[n]o State Party shall expel, return ('refouler') or extradite a person to another State where there are substantial grounds for believing that he would be in danger of being subjected to torture." Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment art. 3(1), *adopted by the U.N. General* Assembly Dec. 10, 1984, S. Treaty Doc. No. 100-20 (1988), 1465 U.N.T.S. 85 [hereinafter Convention Against Torture]. It further notes that for the purposes of determining whether such grounds exist, "the competent authorities shall take into account all relevant considerations including, where applicable, the existence in the State concerned of a consistent pattern of gross, flagrant, or mass violations of human rights." *Id.* at art. 3(2). In its interpretation of the Convention Against Torture, the U.N. Committee Against Torture affirmed that an individual's exposure to the infliction of cruel, inhuman, or degrading treatments or punishments (whether or not such treatments amount in and of themselves to torture) in a State constitutes an indication of a risk of torture if such individuals were to return to that State. U.N. Comm. Against Torture, *General Comment No. 1 Implementation of Article 3 of the Convention in the Context of Article 22 (Refoulement and Communications)*, ¶¶ 29-30, U.N. Doc. A/53/44 (Feb. 2, 2017). Thus, State parties to the Convention Against Torture must give due consideration to such circumstances in deciding on the removal of such a person in conformity with the principle of *non-refoulement*. *Id.*

18. International jurisprudence has interpreted the concept of *non-refoulement* as a core element to the right to be free from torture or other ill-treatment. For instance, Article 7 of the International Covenant on Civil and Political Rights guarantees: "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment." International Covenant on Civil and Political Rights art. 7, Dec. 16, 1966, S. Exec. Doc. E, 95-2 (1978), 999 U.N.T.S. 171 [hereinafter ICCPR].[1] In determining the scope of this provision, the Human Rights Committee affirmed that "States parties must not expose individuals to the danger of torture or cruel, inhuman or degrading treatment or punishment

[1] Although Congress has not passed independent legislation separately implementing the ICCPR's terms, 138 CONG. REC. S4781-01 (daily ed. Apr. 2, 1992), when submitting human rights treaties to the Senate for its advice and consent, the Executive Branch has repeatedly assured the Senate that the United States could and would fulfill its treaty commitments by applying existing federal constitutional and statutory law in such a manner. See ICCPR, S. EXEC. REP. NO. 102-23, at 5, 19, 26-27 (1992) (noting that existing laws obviated the need for further implementing legislation).

upon return to another country by way of their extradition, expulsion or refoulement." U.N. Human Rights Comm., *CCPR General Comment No. 20: Article 7 (Prohibition of Torture, or Other Cruel, Inhuman or Degrading Treatment or Punishment)*, ¶ 9, U.N. Doc. HRI/GEN/1/Rev.7 (Mar. 10, 1992).

19. The right to *non-refoulement* has similarly been incorporated into the European Convention on Human Rights' prohibition on torture and "unhuman or degrading punishment," European Convention on Human Rights art. 3, Nov. 4, 1950, E.T.S. 5. *See also Soering v. the United Kingdom*, 161 Eur. Ct. H.R. (ser. A) (1989) ("Extradition in such circumstances, while not explicitly referred to in … Article 3, would plainly be contrary to the spirit and intendment of the Article, and in the Court's view this inherent obligation not to extradite also extends to cases in which the fugitive would be faced in the receiving State by a real risk of exposure to inhuman or degrading treatment or punishment proscribed by that Article.").

20. The United States must act consistent with the obligations established in treaties to which it is a party, and judicial decisions that fail to uphold those duties put the United States in breach of its international law obligations. Although the treaties applicable to this appeal may not be "self-executing," meaning they do not provide a private right of action in domestic courts absent enabling legislation, RESTATEMENT (THIRD) OF THE FOREIGN RELATIONS LAW OF THE UNITED STATES § 111(4) cmt. c (AM. LAW INST. 1987), they nonetheless "bind the United States as a matter of international law." *Sosa v. Alvarez-Machain*, 542 U.S. 692, 735 (2004). *See also* RESTATEMENT (THIRD) OF THE FOREIGN RELATIONS LAW OF THE UNITED STATES § 111 cmt. h; RESTATEMENT (FOURTH) OF THE FOREIGN RELATIONS LAW OF THE UNITED STATES § 310(1) (AM. LAW INST. 2018) (non-self-executing treaties enforceable in courts through "judicial application of preexisting or newly enacted law"); *Implementation of Human Rights Treaties*, Exec. Order No. 13107, 63 Fed. Reg. 68, 991 (Dec. 10, 1998) ("It shall be the policy and practice of the Government of the United States, being committed to the protection and promotion of human rights and fundamental freedoms, fully to respect and implement its obligations under the international human rights treaties to which it is a party"). The United States acceded to the 1967 Protocol on the Status of Refugees in November 1968. As such, the United States agreed to be bound to "comply with the substantive provisions of Articles 2 through 34 of the 1951 United Nations Convention Relating to the Status of Refugees." *I.N.S. v. Stevic*, 467 U.S. 407, 416 (1984). Moreover, Congress passed the Refugee Act of 1980, amending the language of § 243(h) of the Immigration and Nationality Act (INA) with the specific intent to "conform the language of that section to the Convention" and the express goal "that U.S. statutory law clearly reflects our legal obligations under international agreements." H. REP. NO. 608, 96th Cong. 1st Sess. 17-18 (1979).

21. In addition to its obligations under the Refugee Convention, the Convention Against Torture, and the ICCPR, as well as its obligations under the American Declaration on the Rights and Duties of Man,[2] the United States is bound to ensure the right to *non-*

[2] While the U.S. has not ratified the ACHR, the Inter-American Commission on Human Rights and the Inter-American Human Rights Court have affirmed the binding nature of the American

refoulement, consistent with its obligations under customary international law. Customary international law is derived from the widespread and consistent practice of states following norms and principles to which they comply out of a sense of legal obligation. RESTATEMENT (THIRD) OF THE FOREIGN RELATIONS LAW OF THE UNITED STATES §102 (AM. LAW. INST. 1987). In *The Paquete Habana,* the Court held, "International law is part of our law, and must be ascertained and administered by the courts of justice." 175 U.S. 677, 700 (1900). While non-self-executing treaties such as the ICCPR may require implementing legislation to provide a right of action in U.S. Courts, such sources of law are regarded as persuasive authority and as "evidence of the current state of customary international law." *Abdullahi v. Pfizer, Inc.*, 562 F.3d 163, 176 (2d Cir. 2009).

22. The principle of *non-refoulement* has acquired the force of customary international law and must be duly followed by every State. UNHCR, *Advisory Opinion on the Extraterritorial Application of Non-Refoulement Obligations Under the 1951 Convention Relating to the Status of Refugees and its 1967 Protocol*, ¶ 15 (Jan. 26, 2007), available at https://www.unhcr.org/4d9486929.pdf. *See also* UNHCR, *The Principle of Non-Refoulement as a Norm of Customary International Law: Response to the Questions Posed to UNHCR by the Federal Constitutional Court of the Federal Republic of Germany in Cases 2 BvR 1938/93, 2 BvR 1953/93, 2 BvR 1954/93* (Jan. 31,1994), available at https://www.refworld.org/docid/437b6db64.html ("The Office of the United Nations High Commissioner for Refugees is of the opinion that the principle of *non-refoulement* satisfies this requirement and constitutes a rule of international customary law"); International Comm. of the Red Cross, *Note on Migration and the Principle of* Non-Refoulement, International Review of the Red Cross, 2 (2018), https://international-review.icrc.org/sites/default/files/irrc-904-19.pdf ("In the ICRC's view, the core of the principle of *non-refoulement* has also become customary international law.") The U.S. may only abrogate its international obligations as a matter of domestic law through legislative action showing affirmative congressional intent to do so. *Weinberger v. Rossi*, 456 U.S. 25,32 (1982); *Murray v. The Schooner Charming Betsy*, 6 U.S. 64 (1804).

Implementing the United States' *Non-Refoulment* Obligations

23. Congress implemented the United States' *non-refoulment* obligations through the Refugee Convention and through the FARRA. Congress explicitly intended to implement its international law obligations under the Convention Against Torture through the FARRA. Thus, there is no legitimate basis for an argument that U.S. statutory law abrogated U.S. treaty and customary-based international law obligations to abide by *non-refoulement* principles. The *non-refoulement* legal obligation has consistently been interpreted by implementing treaty bodies and relevant organizations to prohibit states from exposing individuals to the danger of torture, cruel, inhuman or degrading treatment or punishment

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Declaration on the Rights and Duties of Man, of which the United States is a signatory. *See* Interpretation of the American Declaration of the Rights and Duties of Man Within the Framework of Article 64 of the American Convention on Human Rights, Advisory Opinion OC-10/89, Inter-Am. Ct. H.R. (ser. A) No. 10 (July 14, 1989).

by means of refoulement. The United States is thus bound by its commitment to adhere to practices that do not constitute refoulement.

24. In February 1999, the U.S. Department of Justice promulgated a series of regulations implementing FARRA Section 2242, mean to "implement[] United States obligations under the United Nations Convention Against Torture." *See* Regulations Concerning the Convention Against Torture, 64 Fed. Reg. at 8478 (1999). The regulations specifically codified United States obligations under Article 3 regarding *non-refoulment*. *Id.*

25. The CAT regulations mirrored an existing system of implementing the United States' similar *non-refoulement* obligations under Article 33 of the Refugee Convention and its 1967 Protocol. The United States had previously implemented those corollary obligations through a process known as "withholding of removal" if the noncitizen could show that it was more likely than not that his or her "life or freedom would be threatened in that country because of the alien's race, religion, nationality, membership in a particular social group, or political opinion." 8 U.S.C. § 1231(b)(3)(A) (2018).

26. The key difference between the Refugee Convention and CAT's *non-refoulment* obligations, however, is that the Refugee Convention requires harm on account of a protected ground ("nexus") and provides certain exceptions to eligibility, whereas CAT requires no such "nexus" and contains no exceptions. 64 Fed. Reg. at 8478-79.

27. The CAT process is known as withholding or deferral of removal under CAT, meaning that a removal order is issued but withheld because the individual meets the CAT standard. CAT is available for individuals within the jurisdiction of the United States who are barred from withholding of removal and/or those who do not meet the nexus standard under withholding of removal, but otherwise could not be returned to their country of origin because of the likelihood of torture.

How Individuals Apply for CAT Protection

28. As noted above, individuals who are subject to the jurisdiction of the United States are entitled to seek CAT protection, and to receive protection from removal, if they meet the legal requirements.

29. By regulation, an immigration officer must both explain that United States law protects those who fear persecution or torture and ask each person detained various mandatory fear questions. *See id.* § 253.3(b)(2)(i). If an individual arrives at the border seeking fear based protection in the United States, he or she is generally subject to expedited removal, the officer must prepare a Record of Sworn Statement in Proceedings (Form I-867), which contains the facts of the case and any statements made by the alien, and requiring the officer to read "all information contain[ed] on Form I-867A" and record the alien's responses). Form I-867A also contains language that the officer must read to the migrant:

> U.S. law provides protection to certain persons who face persecution, harm or torture upon return to their home country. If

> you fear or have a concern about being removed from the United States or about being sent home, you should tell me so during this interview because you may not have another chance. You will have the opportunity to speak privately and confidentially to another officer about your fear or concern. That officer will determine if you should remain in the United States and not be removed because of that fear.

See U.S. Comm'n on Int'l Religious Freedom, *Evaluation of Credible Fear Referral in Expedited Removal at Ports of Entry in the United States* 13 (2005).

30. If the individual expresses a fear of return, he or she is referred to an asylum officer for either a "credible fear" screening interview or a "reasonable fear" screening interview. A credible fear screening interview is to determine whether there is a significant possibility that the noncitizen could establish eligibility for asylum, withholding of removal, or deferral of removal (CAT). 8 U.S.C. § 1225(b)(1)(B)(v). A "positive" credible fear screening results in referral to an immigration judge (IJ) for a full proceeding, where the judge determines removability, and whether the individual is eligible for and merits any other forms of immigration relief such as asylum, withholding of removal or protection from removal under the CAT.

31. If an individual has previously been removed from the United States and is subject to reinstatement of the prior removal order, but expresses a fear of persecution or torture, he or she is referred for a "reasonable fear" screening. A reasonable fear screening is to determine whether the applicant can establish that there is a reasonable possibility of torture or persecution upon return to the person's country of nationality. *See* 8 C.F.R. § 208.31(c). A "positive" screening results in referral to an immigration judge for the immigration judge to consider the individual's case and eligibility for relief.

32. In CAT cases, "[t]he burden of proof is on the applicant . . . to establish that it is more likely than not that he or she would be tortured if removed to the proposed country of removal." 8 C.F.R. § 1208.16(c)(2). If the applicant shows that it is more likely than not that he or she would be tortured if returned to his or her country of nationality, he or she must also establish that the torture would be "inflicted by, or at the instigation of, or with the consent or acquiescence of, a public official acting in an official capacity or other person acting in an official capacity." 8 C.F.R. § 1208.18(a)(1).

33. CAT protection is difficult to obtain because of the high evidentiary burden and the requisite torture and acquiescence a noncitizen must show. The most recent statistics from Fiscal Year 2018 show that immigration judges granted CAT relief in only 1,334 cases and denied over 25,000 claims. U.S. Dep't of Justice, *Executive Office of Immigration Review, Statistics Yearbook Fiscal Year 2018*, 30 (2018) https://www.justice.gov/eoir/file/1198896/download.[3] This is only 5.33% of cases.

[3] There are no updated statistics beyond 2018 in EOIR's records.

34. In immigration proceedings, individuals have a right to counsel at no expense to the Government, meaning that if they cannot find a *pro bono* attorney or pay for private counsel, they must represent themselves. *See* 8 U.S.C. § 1362. Noncitizens bear the burden of establishing relief from removal, including that they meet the requisite standard for protection under the CAT. Noncitizens are afforded an interpreter during court proceedings, but no interpreters are provided within detention facilities, so individuals who cannot read or write in English often struggle to obtain documents and evidence to submit in support of their case. All documents filed with the immigration court must be in the English language or accompanied by a certified English translation. *See* 8 C.F.R. §§ 1003.33, 1003.23(b)(1)(i).

CAT Grants and Third Country Removals

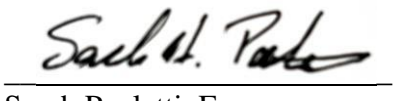
35. Historically, when an individual was granted CAT while detained, he or she would either remain detained for 90 to 180 days, while ICE looked for a third country to accept the individual, and if none was found ICE would release the noncitizen. ICE has the discretion to release anyone at any time during that time-period, and often does when ICE indicates it will not appeal a decision granting CAT protection. Federal regulations vest the authority over a detained noncitizen's custody status with ICE Headquarters if the noncitizen remains detained after the 90-day removal period. *See* 8 C.F.R. § 241.4.

36. Individuals granted CAT are typically released on an Order of Supervision. Many individuals granted CAT protection have remained in the United States for years since the grant of protection under the CAT. Though technically eligible for removal to a third country, this was extremely rare.

37. In 2025, the United States reached agreements with several countries to accept noncitizens for a process known as "third country removal." This was a historically rare occurrence. In light of this, ICE has begun to detain noncitizens complying with their orders of supervision for removal to third countries.

I, Sarah Paoletti, hereby swear that the above statements are true and correct to the best of my knowledge subject to the penalty of perjury pursuant to 28 U.S.C. § 1746.

Dated: May 7, 2026



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Teaching and Academic Service

University of Pennsylvania Law School — **Philadelphia, PA**
Practice Professor of Law and Director, Transnational Legal Clinic — **July 2013 – present**
Practice Associate Professor of Law and Director, Transnational Legal Clinic — **July 2010 – June 2013**
Clinical Supervisor and Lecturer, and Director, Transnational Legal Clinic — **July 2006 – June 2010**

- Founding Director of the Transnational Legal Clinic: teach lawyering seminar in the context of immigration and international human rights law and practice; develop and oversee docket and supervise J.D. and LL.M. students in direct representation of individuals and families in immigration proceedings, human rights litigation, and other international human rights advocacy before international and regional human rights mechanisms, federal courts, governmental agencies and other stakeholders. Created and taught "Human Rights Lawyering in the 21st Century" seminar (Spring 2010, 2011).
- Faculty supervisory roles: Externship Faculty Supervisor (Fall 2006-present); Faculty supervisor to student-run Penn Law Immigration Project (2007-2013, 2020-2021), Penn Law International Human Rights Advocates (2009-2011), Penn Law International Lawyers Organization for Human Rights (LLM student subgroup of Penn Law International Human Rights Advocates) (2012-2013); Penn Law Student Team, 5th Annual World Human Rights Moot Court Competition (Fall 2013).
- Faculty Committee assignments: Penn Law Faculty Advisor, Global Human Rights Certificate Program (2014-present); International Programs Committee (2006-2021); Public Service Committee (2013-present; Chair 2018-21); Search Committees for Assistant Dean for International Programs (Winter 2008-09), and Assistant Dean and Executive Director of the Toll Public Interest Center (2008); Clerkship Committee (Fall 2008).
- Faculty Affiliations: Penn Center for the Study of Ethnicity, Race, and Immigration; Penn Migration Initiative; Perry World House, Global Shifts Faculty Steering Committee; Penn CTRA (Committee on Travel Risk Assessment) (Fall 2019 – present).
- Member, Penn Press Faculty Editorial Board (2021 – present).
- University Faculty Advisory Committee: Co-Organizer of Immigration Town Hall for *The Production, Dissemination, and Use of Knowledge: A Teach-In*, sponsored by Penn Faculty Senate (2017-18); Penn Program on Democracy, Citizenship and Constitutionalism: "Citizenship, Borders and Human Needs" (2007-2008).
- Recipient, Penn Law Beacon Award (2013).

American University Washington College of Law — **Washington, D.C.**
Practitioner-in-Residence, International Human Rights Law Clinic — **July 2003 – June 2006**

- Co-taught clinical seminar on lawyering skills and the practice of human rights and asylum law, supervised J.D. students in live client representation, facilitated weekly case rounds sessions.
- Designed and taught seminar "Advanced Issues in Labor and Employment Law: Immigrants in the Workplace."
- Recipient, 2005 Bellows Scholar Award as Member of Clinic Committee on Serving Clients Having Limited-English Proficiency.

Other Professional Experience

Friends of Farmworkers, Inc. (now Justice at Work) **Philadelphia, PA**
Staff Attorney **September 2002 - July 2003**
Skadden Fellow **September 2000 - August 2002**
Independence Foundation Public Interest Law Fellow **September 1998 - August 1999**
Provided direct legal services in federal and state court, and administrative settings to migrant and seasonal agricultural workers in Pennsylvania, primarily in the area of employment and labor law, as well as landlord-tenant law and civil rights; conducted outreach and rights presentations to migrant workers throughout Pennsylvania; and prepared and conducted trainings in employment law and Title VI discrimination law to statewide legal services agencies, social service agencies, as well as governmental agencies, at local, regional and national conferences.

Judge Anthony J. Scirica, U.S. Court of Appeals, Third Circuit **Philadelphia, PA**
Law Clerk **September 1999 - August 2000**
Legal Intern **June - August 1997**

American Bar Association, Center for Immigration Law and Representation **Washington, D.C.**
Consultant **October 2003 – December 2003**
January 1996 - March 1998
Conducted study on court interpreters in state and federal courts, and prepared bench-guide materials on appointment, certification, and utilization of court interpreters; and, conducted legal research on and analysis of immigration legislation and implementing regulations.

Education

American University Washington College of Law, Washington, D.C.
J.D., May 1998
Honors: *Summa cum Laude*
Activities: International Human Rights Clinic, Dean's Fellow, 1997-1998, Student Attorney, 1996-1997; Pro Bono Committee, Student Representative, 1995-1998; Center for Human Rights and Humanitarian Affairs Consultant (editor for English version of InterAmerican Digest, 1st Ed.), 1998, Dean's Fellow, 1995-1997.

Yale University, New Haven, CT
B.A., Political Science, May 1992

Scholarship

Trauma and Emotions in Human Rights: Reflections from Teaching and Practice, HOW TO ACCOUNT FOR TRAUMA AND EMOTIONS IN LAW TEACHING (Eds. Mallika Kaur & Lindsay M. Harris, Edward Elgar Publishing Ltd) (co-authored with Margaret Satterthwaite and Gabrielle Jackson) (forthcoming).

Bridging the Accountability Gap: A Call to Action for Persons Subjected to Abuse in Immigrant Detention, __ UCLA Journal Int'l Law and Foreign Affairs __ (forthcoming) (co-authored, Azadeh Shahshahani).

Temporary Protected Status in the United States: An incomplete and imperfect complementary system of protection, Background Paper, WORLD DEVELOPMENT REPORT 2023: MIGRANTS, REFUGEES, SOCIETIES, World Bank (2023).

Relentless Pursuits: Reflections of an Immigration and Human Rights Clinician on the Past Four Years, 27 WM. & MARY J. WOMEN & L. 121 (2020).

"Working Towards Recognition of the Rights of Migrant and Refugee Children," in THE OXFORD HANDBOOK OF CHILDREN'S RIGHTS LAW (Jonathan Todres and Shani King, eds., 2020).

The Elusive Promise of Equal Opportunity and Women's Empowerment through Temporary Labor Migration Programs: Lessons in Systemic Discrimination from the United States, in MAKING LAWS, BREAKING SILENCE: CASE STUDIES FROM THE FIELD (Rangita de Silva de Alwis, ed. 2018).

Book Review, *Human Rights in Children's Literature: Imagination and the Narrative of Law* (Oxford University Press, 2016), published in INTERNATIONAL JOURNAL OF CHILDREN'S RIGHTS 25 (2017).

Guerilla Guides to Law Teaching, No. 6: Human Rights Law (with Margaret Sattherthwaite and Amos Toh) (Sept. 2017), available at: https://guerrillaguides.wordpress.com/2017/09/05/no-6-human-rights-law/.

Human Rights Developments at the State and Local Level in the United States: A Bird's-Eye View, PA Bar Quarterly 63 (April 2016) (co-author with Joann Kamuf Ward).

"Preparing Lawyers for Practice in a Globalized World: A Proposal for Transnational Clinical Partnerships," in GLOBALIZATION: THE CRUCIAL PHASE (Brian Spooner ed. 2015).

MIGRANT WORKERS' ACCESS TO JUSTICE AT HOME: NEPAL (Paoletti, Sarah, Sijapati, Bandita, Taylor-Nicholson, Eleanor and Farbenblum, Bassina) (June 2014). Migrant Workers' Access to Justice Series (Open Society Foundations).

MIGRANT WORKERS' ACCESS TO JUSTICE AT HOME: INDONESIA (Farbenblum, Bassina and Taylor-Nicholson, Eleanor and Paoletti, Sarah) (October 2013). Migrant Workers' Access to Justice Series (Open Society Foundations).

Finding the Pearls When the World is Your Oyster: Case and Project Selection in Clinic Design, 5 DREXEL L. REV. 305 (Spring 2013).

"Labor and Employment Rights," in HUMAN RIGHTS IN THE UNITED STATES: A HANDBOOK FOR LEGAL AID ATTORNEYS (Sec. 5.3), Center for Human Rights and Humanitarian Law, American University Washington College of Law (2012, updated 2014).

"The Human Rights of Immigrants: Confronting the Legacy of 9/11," The 9/11 Effect and its Legacy on U.S. Immigration Laws: Essays, Remarks, and Photographs, Penn State Law and The Pennsylvania State University, School of International Service, pp. 57–60, State College, PA (Fall 2011).

"Using the Universal Periodic Review to Advance Human Rights: What Happens in Geneva Must Not Stay in Geneva," 45 CLEARINGHOUSE REV. 268 (2011).

Report of the August 2011 Human Rights Delegation to Hershey, Pennsylvania (Sept. 2, 2011) (co-author, Colleen P. Breslin, Stephanie Luce, Beth Lyon; contributing editors, Fran Ansley, William Quigley).

Redefining Human Rights Lawyering Through the Lens of Critical Theory: Lessons for Pedagogy and Practice, 18 Georgetown Journal of Poverty Law & Policy 337 (2011) (co-author with Caroline Bettinger-Lopez, Davida Finger, Meetali Jain, JoNel Newman, and Deborah M. Weismann).

Transnational Approaches to Transnational Exploitation: A Proposal for Bi-National Migrant Rights Clinics, 30 U. PA. J. INT'L L. 1171 (Summer 2009).

Pursuit of a Rights-Based Approach to Migration: Recent Developments at the UN and the Inter-American System, HUMAN RIGHTS BRIEF, Center for Human Rights and Humanitarian Law, Vol. 14, No. 3 (Spring 2007). Updated and reprinted in HUMAN RIGHTS OF MIGRANTS: ISSUES AND PERSPECTIVES (ed. Manoj Kumar Pattanaik), Ifcai University Press, India (2008).

Deriving Support from International Law for the Right to Counsel in Civil Cases, 15 TEMP. POL. & CIV. RTS. L. REV. 651 (Summer 2006).

Making Visible the Invisible: Strategies for Responding to Globalization's Impact on Immigrant Workers in the United States, 13 IND. J. GLOBAL LEGAL STUD. 105 (Winter 2006).

Inter-American Developments on Globalization's Refugees: New Rights for Migrant Workers and Their Families, EUROPEAN YEARBOOK OF MINORITY ISSUES VOL. 3, 2003/4 ISBN 90 04 14820 0, 63-87 (co-author with Beth Lyon).

Human Rights for All Workers: The Emergence of Protections for Unauthorized Workers in the Inter-American Human Rights System, HUMAN RIGHTS BRIEF, Center for Human Rights and Humanitarian Law, Vol. 12, No. 1 (Fall 2004).

"Court Interpreters and Preserving Due Process in Criminal Proceedings," ABA JUDGE'S GUIDE TO IMMIGRATION LAW IN CRIMINAL PROCEEDINGS, American Bar Association (2004).

Symposium, "Q. Should illegal aliens be able to sue U.S. employers for labor racketeering? YES: Employees who have suffered discrimination or exploitation in the workplace are entitled to sue, regardless of their immigration status," *Insight Magazine, Washington Times*, Jan. 6-19, 2004.

Changes to U.S. Law Threaten Refugees, HUMAN RIGHTS BRIEF, Center for Human Rights and Humanitarian Law, Vol. 4, No. 1 (1996).

***Amicus* Briefs and Written Legal Advocacy**

Author of and Co-Counsel to *Amici Curiae* Immigration and International Human Rights Law Professors in Support of Petitioner, Mbabynong v. Garland, No. 21-60932, U.S. Court of Appeals for the 5th Circuit, filed April 20, 2022.

Author, Supplement to Petition on Labor Law Matters Arising in the United States, submitted to the Labor Policy and Institutional Relations Unit, General Directorate of Institutional Relations, Secretariat of Labor and Social Welfare, USMCA, Regarding the Failure of the U.S. Government to Effectively Enforce Domestic Labor Laws and Promote the Elimination of Employment Discrimination in the H-2 Program in Violation of Chapter 23 of the United States-Mexico-Canada Agreement (USMCA), filed June 24, 2021.

Author and Counsel of Record to Amici Curiae International Human Rights Experts and Refugee Rights Experts, B.C. v. Attorney General of the United States, No. 19-1408, U.S. Court of Appeals for the 3rd Circuit, filed Aug. 31, 2020.

Author and Counsel of Record to Amici Curiae International Law Professors and Human Rights Clinicians, Reid v. Donelan, No. 19-1787, 19-1900, U.S. Court of Appeals for the 1st Circuit, filed February 19, 2020.

Author and Counsel of Record to Amici Curiae International Law Professors and Human Rights Clinicians, German Santos vs. Warden, Pike County Correctional Facility, No. 19-2663, U.S. Court of Appeals for the 3rd Circuit, filed Dec. 30, 2019.

Author and Counsel of Record to Amicus Curiae Richard J. Goldstone, Al Bahlul v. Trump, No. 16-1307, in support of petition for certiorari, U.S. Supreme Court, filed May 30, 2017.

Author and Counsel of Record to *Amici Curiae*, International Law Professors and Human Rights Clinicians, Reid v. Donelan, U.S. Court of Appeals for the 1st Circuit, filed March 5, 2015.

Author and Counsel of Record to *Amici Curiae*, International Law Professors, Human Rights Clinicians and Clinical Programs, Rodriguez v. Robbins, U.S. Court of Appeals for the 9th Circuit, filed September 29, 2014.

Author and Counsel of Record to *Amici Curiae*, Historians, Political Scientists, and Constitutional Law Scholars, United States v. Al Bahlul, U.S. Court of Appeals for the D.C. Circuit, *En Banc*, filed June 10, 2013.

Contributor and Signatory, *Amicus Curiae* Brief presented by the International Commission for Labor Rights (ICLR) and Adhering Organizations and Individuals in the Labor Rights (ICLR) and Adhering Organizations and Individuals in the Case of the National Union of Mine, Metal, Steel and Allied Workers of the Mexican Republic (Amparo en Revisión 67/2010), filed September 10, 2010.

Author and Counsel of Record to *Amici*, Historians, Political Scientists, and Constitutional Law Scholars, United States v. Al Bahlul, U.S. Court of Military Commissions Review, filed October 15, 2009.

Counsel of Record to *Amici*, International Human Rights Scholars, Practitioners and Organizations, Pierre v. Mukasey, U.S. Court of Appeals for the Third Circuit (En Banc), filed January 22, 2008.

Counsel to *Amici*, Canadian Parliamentarians and International Law Scholars and Experts in the Area of International Humanitarian Law, International Criminal Law and International Human Rights Law, United States of America v. Omar Ahmed Khadr, Military Commission, Guantanamo, filed January 18, 2008.

Counsel to *Amici*, International Law Scholars, Al Odah v. USA, No. 96-1196, U.S. Supreme Court, filed August 23, 2007.

Counsel to *Amici*, International Law Scholars, Khadr v. Gates, No. 07-1156, U.S. Court of Appeals for the D.C. Circuit, filed May 23, 2007.

Select Media Appearances and Blog Posts

OpEd, "Where is the accountability? Alleged abuses persist in ICE detention," co-author with Azadeh Shahshahani of Project South, The Hill (November 18, 2022).

Guest, "Is there any hope for a broken immigration system?" NewsRadioKYW (January 19, 2023).

Guest, "Fast Take: Supreme Court weighs 'remain in Mexico' immigration dispute," Reuters Video (April 26, 2022).

Guest, "Sarah Paoletti: Champion of Human Rights and Immigrant Justice," Immigration Nerds Podcast (March 25, 2022).

Guest, "The real reasons why immigration stays broken, no matter who is president," NewsRadioKYW *In*Depth (November 10,2021).

OpEd, "ICE detention has now been referred to as 'torture,'" co-author with Azadeh Shahshahani of Project South, The Independent (June 28, 2021).

OpEd, "The time has come for a reckoning on U.S. immigrant abuse," co-author with Azadeh Shahshahani of Project South, Al Jazeera (November 22, 2020).

Guest, "DACA in the cross-hairs," WHYY's Radio Times (Nov. 20, 2019).

"The U.S. Bears International Responsibility for Forced Sterilization of Women in ICE Detention," co-author with Lisa Reinsberg, Just Security (September 29, 2020)

"Shining a Light on Persistent Abuses in J-1 'Cultural Exchange Program,'" Human Rights at Home Blog (August 7, 2019).

"The Supreme Court Holds the Line on Truth over Pretext," The Regulatory Review, addressing the U.S. Supreme Court decision *in Department of Commerce v. New York* (July 15, 2019).

Frequent appearances on Knowledge@Wharton XM Sirius Radio show on immigration topics in the news (December 2016 – Fall 2019).

"Jennings v. Rodriguez in an Era of Mass Incarceration of Non-Citizens," The Regulatory Review (July 23, 2018).

"How Many More Families Must Endure the Death of a Loved One Before the U.S. Wil Put an End to the Abusive Detention of Immigrants?: 70 Organizations Call on the International Community to Intervene, Human Rights at Home Blog (May 15, 2018).

"The Global Compact on Migration: The Opportunity for Constructive Engagement," Penn Law Global Affairs Review (May 2018).

"The Global Compact on Migration: The Opportunity for Constructive Engagement Remains," Penn Law Global Affairs Blog (January 9, 2018).

"Today, I Speak." Human Rights at Home Blog (August 16, 2017).

"Oh Canada, Oh Canada – We Need You!" co-authored with JoAnn Kamuf Ward, Human Rights at Home Blog (March 28, 2017).

"No Excuse for US Refusal to Attend Inter-American Commission Hearing," Human Rights at Home Blog (March 21, 2017).

"The Roots of the EU Migration and Refugee Crises," *Faculty Video Podcasts*. Paper 7. http://scholarship.law.upenn.edu/podcasts/7 (with Federico Soda) (October 2015).

"Europe's Migrant Crisis: Balancing the Risks with Long-Term Gains," Knowledge@Wharton, September 9, 2015, (with Robert Meyer).

"Immigrant Workers Challenge the Legacy of Hoffman Plastics Before the IACHR," co-authored with Rebecca Smith, Human Rights at Home Blog (March 17, 2015).

"Parsing President Trump's Executive Orders on Immigration, Case in Point, Penn Law (February 2, 2017).

"Two years after the earthquake, members of Haitian civil society want human rights respected," co-authored with Nicole Phillips, IntLawGrrls (January 12, 2012).

"Human Rights Should not be Graded on a Curve," Op-Ed, CBSNews.com (September 14, 2010), available at: http://www.cbsnews.com/2100-215_162-6864976.html.

Fox Business, Varney and Company (discussing Freedom of Association and U.S. report on human rights prepared for UN Universal Periodic Review Process), September 9, 2010.

PBS NewsHour, "Tribe Divided Over Providing Water to Illegal Migrants Crossing Indian Land," September 16, 2008.

Professional Activities

Appointed Member, Faculty Editorial Board, University of Pennsylvania Press (September 2021 – present).

Member, Global Strategic Litigation Council for Refugee Rights, hosted by Zolberg Institute on Migration and Mobility, and Cornell Law School, Migration and Human Rights Program (September 2021 – present).

Advisory Group Member, FairSquare Projects' Five Corridors Project on the fair recruitment of migrant workers (Fall 2019 – present).

Member, Executive Committee, Migration that Works (formerly, International Labor Recruitment Working Group) (February 2017 – present).

Co-Chair, Bringing Human Rights Home Inter-American Working Group, Human Rights Institute, Columbia University Law School (May 2011-present).

Co-Chair, Committee on International Legal Education, Section on Clinical Legal Education (February 2009 - present).

Project Co-Director, Asia-Middle East Corridor Migrant Worker Access to Justice Project, August 2011 – June 2015 (with Co-director Bassina Farbenblum, University of New South Wales, and Research Director Eleanor Taylor Nicholson) (grantee of Open Society Foundations-International Migration Initiative).

Consultant and Advisory Board Member, Local Human Rights Lawyering Project, Center for Human Rights and Humanitarian Law, American University Washington College of Law (January 2012 – 2015).

Visiting Fellow, University of New South Wales Faculty of Law, Sydney, AUSTRALIA (August 2013).

Co-Chair, US Human Rights Network International Covenant on Civil and Political Rights Taskforce (Dec. 2011-March 2013). Taskforce Member (March 2013-March 2014).

Consultant / Senior Coordinator, US Human Rights Network, US Universal Periodic Review Project (January 2010 – May 2011) (coordinate civil society participation in, draft written submissions for, and conduct presentations and meetings in conjunction with US Universal Periodic Review before the UN Human Rights Council).

Chair, International Human Rights Law Section, AALS (Jan. 2010-Jan. 2011); Chair-Elect (Jan. 2009-Jan. 2010); Member of Executive Committee (January 2006-January 2014).

Member, Communications Committee, Section on Clinical Legal Education (February 2010 – April 2013).

Member, International Human Rights Delegation to Hershey, PA (August 2011) (investigating alleged abuses of J-1 student workers).

Member, International Commission on Labor Rights Delegation to Mexico City, MEXICO (May 18-24, 2010) (investigating labor rights of Union of Mexican Electrical Workers ("SME") and National Union of Miners, Metalworkers and Allied Workers of the Republic of Mexico).

Chair, Labor and Immigration Working Groups, US Human Rights Network, US Compliance Review before the UN Committee on the Elimination of Racial Discrimination (report submitted December 2007), participation in hearings before UN CERD, Geneva, SWITZERLAND (February 21-22, 2008).

Consultant / Visiting Scholar, Clinical Legal Education Training, China University of Politics and Law, Beijing, CHINA (December 18-31, 2007); Consultant / Trainer, Clinical Legal Education Training, Guangzhou, CHINA (July 23-August 3, 2007) (American University Washington College of Law, USAID funded program).

Co-Chair and Presenter, Annual International Human Rights Clinical Conference, Washington, D.C. (January 2007).

Select Scholarly Presentations, Workshops and Trainings

Presenter, "Rights Recognition vs Accountability and Redress: The Struggle to Obtain Justice For Immigrants Subjected to Abuses in U.S. Custody," Bringing Human Rights Home, Symposium, The Promise Institute and the Journal of Intl Law and Foreign Affairs, UCLA, Los Angeles, CA (March 4, 2023).

Presenter, "De-colonizing Labor Migration," Immigration Equality, 19th Annual Wiley A. Branton Symposium,

The Howard Law Journal, Washington, D.C. (October 6, 2022).

Panelist, "Immigration: A Philadelphia Perspective," Forum on Migration, Wolf Humanities Center, University of Pennsylvania, Philadelphia, PA (February 16, 2022).

Presenter, "If You Build It, Will They Stop Coming: The Continuing Border Dilemma, Broken Immigration System and Potential Solutions," Philadelphia Bar Association 2021 Virtual Bench-Bar and Annual Conference (October 1, 2021).

Presenter, "The World is Your Oyster: Evidence in Immigration Court," Immigration Law Conference, Federal Bar Association, virtual (May 13, 2021).

Penn To You Miami, Navigating Global Affairs, Miami, FL (Feb. 12, 2020).

Faculty, Pre-College Summer Academy, Human Rights Track, Penn Law, Philadelphia, PA (July 22-26, 2019).

Moderator: Workshop, Precarious Statuses of Migrants (Opening Plenary), Perry World House, University of Pennsylvania (May 23, 2019).

Co-Planner and Presenter, "Teaching Law Students to Address Issues of Race and Privilege," AALS Annual Conference on Clinical Legal Education, San Francisco, CA (May 6, 2019).

Planner and Host, 2019 Annual International Human Rights Clinical Conference, Penn Law, Philadelphia, PA (April 26-28, 2019).

Faculty, "Immigration Law," Continuing Judicial Education Program, sponsored by Administrative Office of Pennsylvania Courts, Judicial Education Department, Harrisburg, PA (April 25, 2019).

Invited Participant and Commentator, Model International Mobility Declaration Workshop, Perry World House, University of Pennsylvania, Philadelphia, PA (Feb. 22, 2019).

Panelist, "Gender & Labor Migration: Migrant Worker Women's Rights in the Context of Temporary Labor Migration Programs," 2nd Annual Metropolis North America Migration Policy Forum, Mexico City, MX (Sept. 28, 2018).

Invited Panelist, Roundtable, Migrants at Work in Canada Symposium, Queens College, Kingston, ON (April 21, 2018).

Panelist, "Decolonizing Legal Education," Law and Society, Toronto, ON (June 2018).

Discussant, "Evaluating Prospects for Institutional, Legal, and Policy Reforms on International Migration and Refugees," Perry World House 2018 Global Shifts Colloquium: Prospects for Institutional and Policy Reform on International Migration and Refugees, Univ. of Pennsylvania (April 9, 2018).

Moderator, "The Origins and Consequences of Immigration Severity (II)," Drexel Law Review Symposium, Twenty Years After the 1996 Immigration Laws: Revisiting an Experiment in Comprehensive Severity (October 14, 2016).

Presenter, "United Nations Human Rights Mechanisms and Migrants' Rights," The Human Rights of Migrants: Challenges and Opportunities in California, co-sponsored by the International Justice Resource Center and the Center for Gender and Refugee Studies, UC Hastings School of Law, San Francisco, CA (September 23, 2016).

Co-planner and presenter, "Reimagining Advocacy: Adapting Clinical Models to Meet Community Needs," AALS Annual Conference on Clinical Legal Education, Baltimore, MD (May 3, 2016).

Invited Speaker, "Immigration and Social Justice," Korean-American Student Conference, University of Pennsylvania (July 17, 2015).

Invited Panelist, "Innovations for Thriving in the 'New Normal'," International Human Rights Clinical Conference, New York, NY (June 14, 2015).

Presenter, "Overview of the Inter-American System," Engaging with the Inter-American Human Rights System for U.S. Advocacy, The Bringing Human Rights Home Lawyers' Network Annual Human Rights in the U.S. Symposium/CLE, co-sponsored by the Columbia Law School Human Rights Institute, the Center for Justice and International Law (CEJIL), International Justice Resource Center, American Civil Liberties Union, Robert F. Kennedy Center for Justice and Human Rights, University of Pennsylvania Transnational Legal Clinic, New York, NY (June 12, 2015).

Co-planner and presenter, "Globalization of Legal Practice: A Comparative Exploration of the Benefits, Challenges, and Pitfalls of Preparing Laws for Practices in the Global Community through Clinics and International Externship Placements," AALS Annual Conference on Clinical Legal Education, Rancho Mirage, CA (May 6, 2015).

Trainer, "The Nuts and Bolts of Human Rights in Practice," Maryland Legal Aid Bureau Annual Statewide Training, Ocean City, MD (April 28, 2015).

Invited Panelist, "Economic, Social, and Cultural Rights in the United States," Building the Human Rights Movement in the United States, co-sponsored by the US Human Rights Network and the Roosevelt House Public Policy Institute at Hunter College, New York, NY (April 17, 2015).

Invited Presenter, Oportunidades y límites de las medidas migratorias propuestas por el Presidente Barack Obama ¿Qué pueden y deben hacer México y Centroamérica?, co-sponsored by the Mexican Foreign Secretary, Autonomous Institute of Technology of Mexico (ITAM), and BBVA Bancomer Foundation, Mexico City, MEXICO (April 14, 2015).

Presenter, "Business, Economic Development, & Human Rights," Penn Human Rights Conference, University of Pennsylvania, Philadelphia, PA (February 21, 2015).

Invited Panelist, "International Trade, Migration and Migrant Workers: International and Domestic Frameworks," Immigration and Freedom of Movement Symposium, University of Texas International Law Journal Symposium, co-sponsored by the Bernard and Audre Rapoport Center for Human Rights and Justice and the Latin American Initiative at the University of Texas School of Law, Austin, TX (February 5, 2015).

Invited Presenter, "LGBT rights at home and abroad: Enforcement of human rights norms around the world, and immigration rights," CLE sponsored by The Mazzoni Center's Legal Department, Philadelphia, PA (February 19, 2015)

Invited Presenter, "Migrant Worker Rights: The International and Domestic Law Mechanisms Applicable to Nepali Migrant Workers," Implementation of the SARTUC (South Asian Regional Trade Union Council) Migrant Labour Charter and the Kathmandu Plan of Action, Kathmandu, NEPAL (January 7, 2015).

Lecturer, 'Redefining Human Rights through the Lens of Critical Theory' Lecture Series LXXXI Social Sciences Baha, Kathmandu, NEPAL (January 5, 2015).

Presenter, "The Human Rights of Migrants: From Treaty to Reality," Twentieth Annual Herbert Rubin and Justice Rose Luttan Rubin International Law Symposium, sponsored by he NYU Center for Human Rights and Global Justice, and The Migration Policy Institute, along with the NYU Immigrant Rights Project, NYU Law Students for Human Rights, NYU Anti Trafficking Advocacy Coalition, and the NYU International Law Society, New York, New York (November 6, 2014)

Speaker, "Working Together? The Transnational Crossroads of Justice, Education, and Migration," Association of Canadian Clinical Legal Education Annual Conference, Windsor, ON (October 24, 2014).

Speaker, "Putting Power Behind the Prose: Using International Human Rights Law to Influence American Jurisprudence and Policy" Philadelphia Bar Association Chancellor's Forum, Philadelphia, PA (October 22, 2013).

Plenary Speaker, "Beyond Property Rights: State v. Shack's Role in Guaranteeing Access to Justice for Migrant Workers," AALS Mid-Year Meeting, San Diego, CA (June 12, 2013).

Presenter, "When the World is Your Community: The Challenges of Human Rights and Transnational Clinics" AALS Annual Conference on Clinical Legal Education, San Juan, Puerto Rico (April 30, 2013).

Invited Participant, Workshop on Transnational Collaborative Lawyering, Harvard Law School, Cambridge, MA (April 1, 2013).

Moderator, Talk Back following De Novo Theatre Company presentation, "Houses on the Moon," co-sponored by Penn Law Immigrant Rights Project and HIAS Pennsylvania, Penn Law, Philadelphia, PA (March 28, 2013).

Moderator, Discussion on Human Trafficking and Documentary, "Fatal Promises," Penn Law International Lawyers Organization for Human Rights, Penn Law, Philadelphia, PA (March 20, 2013).

Trainer, International Human Rights, Labor and Employment Law: A Training for Legal Aid Lawyers, hosted by the Maryland Legal Aid Bureau and the Local Human Rights Lawyering Project, Center for Human Rights and Humanitarian Affairs, American University Washington College of Law, Baltimore, MD (January 25, 2013).

Moderator, "International Search for a Remedy," Mass Torts in a Shrinking World Symposium, Journal of International Law, Penn Law, Philadelphia, PA (November 2, 2012).
Presenter, "So Many Choices, So Little Time: Designing a Clinical Program in the Post-Global World," Building Global Professionalism: Emerging Trends in International and Transnational Legal Education, Symposium hosted by Drexel Law Review and Drexel International Law and Human Rights Society, Drexel University Earle Mack School of Law, Philadelphia, PA (October 12, 2012).

Trainer, International Human Rights, Labor and Employment Law: A Training for Legal Aid Lawyers, hosted by the Local Human Rights Lawyering Project, Center for Human Rights and Humanitarian Affairs, American University Washington College of Law, Austin and San Antonio, Texas (August 2-3, 2012).

Guest Lecturer, "Human Rights of (Im)migrants," Columbia Law School Human Rights Institute and University of New South Wales Summer Program, New York, New York (July 2, 2012).

Presenter, "Domestic Workers from Indonesia to Kuwait: A Case Study Mapping Access to Justice Along the SE Asia-Middle East Corridor," Regulating Decent Work for Domestic Workers: Critical Reflections (sponsored by CRN08 Labor Rights and IRC07 Globalization, Transnational, and Domestic Labor Governance), 2012 International Conference on Law and Society, Honolulu, Hawai'i (June 6, 2012).

Chair and Moderator, "Author Meets Reader – On the Frontlines: Gender, War, and the Post Conflict Process (by Fionnuala ni Aolain, Dina Francesca Haynes, and Naomi Cahn" (sponsored by CRN07 Feminist Legal Theory), 2012 International Conference on Law and Society, Honolulu, Hawai'i (June 5, 2012).

Presenter, Labour Rights as Human Rights: Migration, Labour Market Restructuring and the Role of Civil Society in Global Governance Conference, hosted by UNESCO-MOST, Norrköping, SWEDEN (May 30-June 1, 2012).

Small Group Leader, "Human Rights/International," AALS Annual Conference on Clinical Legal Education, Los Angeles (April 30-May 3, 2012).

Trainer, "International Human Rights Law and Mechanisms Applicable to Migrant Workers," Human Rights Training for Migrant Rights Advocacy, co-sponsored by Pravasi Nepali Coordination Committee (PNCC) and Swiss Agency for Development and Cooperation (SDC), Kathmandu, NEPAL (April 4-5, 2012).

Moderator, "An Assessment of Modern Day Economic, Cultural and Social Rights: From Martin Luther King, Jr. to Today," Teleconference sponsored by the ABA Section of International Law (March 26, 2012).

Presenter, Legal Workshop on Corporate Social Responsibility for Businesses Registered in HOPE II and Their Stakeholders, co-hosted by The Association of Industries of Haiti and BetterWork Haiti (co-presenters: Garrick Apollon, Penn Law LLCM Candidate; and, Sara Begley, Reed Smith LLP), Port-au-Prince, HAITI (March 20, 2012).

Co-planner and presenter, Twenty Years After U.S. Ratification of the ICCPR Symposium, co-sponsored by the American Civil Liberties Union, Human Rights Institute – Columbia Law School, and the Transnational Legal Clinic – University of Pennsylvania Law School (March 16, 2012).

Co-planner and trainer, Advocacy Before the UN Human Rights Committee, New York, NY, co-sponsored by American Civil Liberties Union, Center for Human Rights and Humanitarian Affairs – American University Washington College of Law, and Transnational Legal Clinic – University of Pennsylvania Law School, and the US Human Rights Network (March 15, 2012).

Presenter, Defining Human Rights Lawyering (book prospectus), Mid-Atlantic Clinical Theory Workshop, Washington, D.C. (Februrary 24, 2012).

Guest Lecturer, "Human rights of migrants," International Women's Human Rights Clinic, CUNY Law (February 16, 2012).

Invited Participant and Working Group Facilitator, "Framing Economic, Social and Cultural Rights for Advocacy and Mobilization: Towards a Strategic Agenda in the United States," Program on Human Rights and the Global Economy, Northeastern University School of Law (November 3-4, 2011).

Panelist, "Immigration and Human Rights," The 9/11 Effect and its Legacy on U.S. Immigration Law Symposium, Penn State Law, State College, PA (September 16, 2011).

Trainer, "Preparing for the Universal Periodic Review," hosted by Bureau des Avocats Internationaux, Port-au-Prince, HAITI (August 15-16, 2011).

Presenter, "Redefining Human Rights Lawyering through the Lens of Critical Theory: Role of Transnational Partnerships in our Pedagogy and Practice," 6th Global Alliance for Justice Education Worldwide Conference, Valencia, SPAIN (July 13, 2011) (with Davida Finger and Meetali Jain).

Co-Planner and Presenter, "Preparing Students for Practice in a Globalized World: Teaching Complex Problem Solving through Transnational Partnerships," AALS Conference on Clinical Legal Education, Seattle, WA (June 15, 2011).

Panelist, "Immigration and the American Dream," The Obama Administration and Human Rights Conference, American University, Washington, D.C. (April 28, 2011).

Presenter, "U.S. Participation in the UN Human Rights Council's Universal Periodic Review Process," D.C. Bar Association International Law Section, Washington, D.C. (April 27, 2011).

Presenter, "Preparing Lawyers for Practice in a Globalized World: A Proposal for Transnational Clinical Partnerships," Penn Globalization Forum (April 15, 2011).

Panelist, "Professionalism in Action," 5th Annual Global Health Career Day, University of Pennsylvania School of Medicine (March 26, 2011).

Commentator, "Is Access to Health Care a Human Rights? A Global Perspective," Symposium, Penn (Wharton and School of Nursing) Global Health Reflections Week Symposium (February 23, 2011).

Presenter, "International Human Rights and Law and Organizing as the Pillars in Building the Bridge to Overcome the Rights-Reality Divide," International and Comparative Legal Perspectives on the Rights of Non-Citizens, Second Annual Symposium of International, Comparative, and Human Rights Journal of Notre Dame, Notre Dame, IN (February 19, 2011).

Guest Speaker, "The US UPR and an Assessment of the UPR Process," Assessing Compliance: The Role of Human Rights Monitoring Mechanisms, Center for International Human Rights, John Jay College of Criminal Justice, CUNY Graduate Center, New York, NY (February 10, 2011).

Panelist, "Human Rights: Contested Principles and Practices," University of Pennsylvania Faculty Senate Founder's Day Symposium (January 20, 2011).

Presenter, *Redefining Human Rights Lawyering Through the Lens of Critical Theory: Lessons for Pedagogy and Practice*, (with co-authors with Caroline Bettinger-Lopez, Davida Finger, Meetali Jain, JoNel Newman, and Deborah M. Weismann), Society of American Law Teacher's Bi-Annual Teaching Conference, University of Hawaii, Honolulu (December 13, 2010).

Invited Participant and Panelist, Symposium on Economic, Social and Cultural Rights of Non-Citizens, Northeastern School of Law, Boston, MA (October 14-15, 2010).

Presenter, “Engaging the US through the Universal Periodic Review to Advance Economic and Social Rights in the Times of Crisis,” LatCrit XV Conference, Denver, CO (October 8-9, 2010).

Presenter, “New Clinicians (Things I Wish Someone Had Told Me When I Started),” AALS Workshop for New Law School Clinical Teachers, Washington, DC (June 20, 2010).

Presenter, “Migrant Workers in the United States: Legal and Practical Challenges to Rights Enforcement,” Inter-American Commission on Human Rights Secretariat Staff Training, Washington, DC (May 12, 2010).

Presenter, “Redefining Human Rights Lawyering Through the Lens of Critical Theory,” AALS Conference on Clinical Legal Education, Baltimore, MD (May 7-8, 2010).

Panel Chair, “Alternative Cosmopolitanisms,” Sovereignty and Cosmopolitan Alternatives, 2010 Annual Conference of The Penn Program on Democracy, Citizenship, and Constitutionalism, University of Pennsylvania, Philadelphia, PA (April 30, 2010).

Panelist, “Challenging America’s Human Rights Record at Home,” Program Session, Amnesty USA, Annual General Meeting, New Orleans, LA (April 10, 2010).

Panelist, “Using Human Rights Mechanisms,” Alternative Methods of Advancing International Labor Rights, 2010 Founders’ Celebration, American University Washington College of Law, Washington, DC (February 18, 2010).

Moderator, “Comparative Perspectives: Citizenship, Identity and Racial Discrimination in Latin America and the Caribbean,” Afro-Descendants and Indigenous Peoples in Latin America and the Caribbean: Legal Rights and Realities Symposium, Journal of International Law, Penn Law, Philadelphia, PA (February 5, 2010).

Presenter, “Collaborative Responses to Transnational Migration,” Globalization in Progress: Understanding and Working with World Urbanization, Faculty Forum on Globalization and Cities, Penn Institute for Urban Research (October 17, 2009).

Presenter, “Serving Limited English Proficient (LEP) Clients under the Workforce Investment Act (WIA) and the Trade Adjustment Act (TAA),” 2009 National Equal Opportunity Professional Development Forum, U.S. Dept. of Labor, Civil Rights Center, and National Association of State Workforce Agencies (September 2, 2009).

Panelist, “Seizing the Moment to Engage the Obama Administration in Real Change for Women and Girls,” ACLU Roundtable during meeting of U.N. Commission on Status of Women, New York, NY (March 5, 2009).

Presenter, "New Legal Methods and Approaches for a Newly Defined Immigrant Worker: Law and Organizing with a Human Rights Lens," *The Evolving Definition of the Immigrant Worker: The Intersection Between Employment, Labor, and Human Rights Law*, University of San Francisco Law Review Symposium 2009, San Francisco, CA (February 27, 2009).

Invited Speaker, "Gender Sensitive Labour-Migration Policies: Perspectives and Experiences from the United States," Seminar on Gender Sensitive Labour-Migration Policies, Organization for Security and Cooperation in Europe, Brdo, SLOVENIA (February 16-17, 2009).

Presenter, "Claiming Dignity for Migrant Workers: Bringing International Human Rights to the Law and Organizing Movement," New Voices in Human Rights, AALS Annual Conference, San Diego, CA (January 7, 2009).

Co-Presenter, "Risks, Mistakes and Opportunities When Clinics Engage in Project-Based 'Cases': A Case Study of Project Selection and Management Through Examination of Work with the Liberian Truth and Reconciliation Commission," AALS Annual Conference on Clinical Legal Education, Tuscon, AZ (May 7, 2008).

Presenter, "Law, Ethics and Human Rights in Developing Countries," Second Annual Penn Global Development Initiative Forum, Philadelphia, PA (April 11, 2008).

Faculty, "Broad Strategies and Case Studies: Migrant Workers and the Inter-American Human Rights System," The United States and the Inter-American Human Rights System CLE Program sponsored by Columbia Law School Human Rights Institute, Center for Justice and International Law, and the American Society of International Law, New York, NY (April 7, 2008).

Commentator, "Three Models of Solidarity," by Sarah Song, Penn Program on Democracy, Citizenship and Constitutionalism, University of Pennsylvania (March 6, 2008).

Faculty, Gender-based Asylum Claims, training sponsored by World Organization for Human Rights, Washington, D.C. (February 1, 2008).

Plenary Speaker, Migrant Rights as Human Rights, University of Texas Medical Branch (UTMB), Galveston, TX (November 14, 2007).

Facilitator and Panelist, Working Hands: Immigrant Workers and Human Rights, sponsored by the ACLU, National Employment Law Center (NELP), The Farmworker Association of Florida, ACLU of Florida, Ft. Myers, FL (November 2-4, 2007).

Presenter, "Non-Discrimination and Immigrant Workers," Penn Symposium on Immigration, National Press Club, Washington, D.C. (November 2, 2007).

Facilitator, Bi-National Labor Justice Convening, convened by ProDESC and El Centro de los Derechos del Migrante, Mexico City, MX (October 5-8, 2007).

Faculty and Coordinator, Statement-Taking Training for the Liberian Truth and Reconciliation Commission, Schnader, Harrison, Segal & Lewis, Philadelphia, PA (June 14-15, 2007).

Small Group Leader, "Human Rights/International," AALS Annual Conference on Clinical Legal Education, New Orleans (May 3-6, 2007).

Faculty, "Comparative Law Case Study: Civil *Gideon*," Comparative Foreign Law in U.S. Courts and Advocacy CLE Program, sponsored by Columbia Law School, Northeastern University School of Law and American Society of International Law, New York, NY (April 19, 2007).

Faculty, "Applying International Standards to U.S. Civil Rights and Social Justice," Civil Rights in the 21st Century CLE Program, sponsored by Pennsylvania Bar Institute and the Pennsylvania Bar Association Civil and Equal Rights Committee, Philadelphia, PA (April 12, 2007).

Presenter, "Migrant Workers and Labor Rights," Towards Comprehensive Migration Policies, sponsored by FLASCO, Columbia Law School, Open Society Justice Initiative and Northern Manhattan Coalition for Immigrant Rights, Santo Domingo, DOMINICAN REPUBLIC (March 30, 2007).

Presenter, "The Protection of Vulnerable Groups in the Inter-American Human Rights System," Second Annual Meeting on Human Rights, Academy on Human Rights and Humanitarian Law, American University Washington College of Law, Washington, D.C. (March 9, 2007).

Plenary Speaker, "A Critical Look at the Health and Human Rights of Economic Migrants," Beyond Borders: Global Health and Migrating Populations, 16th annual Global Health Education Consortium Conference, Santo Domingo, DOMINICAN REPUBLIC (February 17, 2007).

Invited Speaker/Expert, Special Meeting on the Inter-American Program for the Promotion and Protection of the Human Rights of Migrants, Including Migrant Workers and their Families, coordinated by the Committee on Political and Juridical Affairs of the Organization of American States, Washington, D.C. (February 13, 2007).

Faculty, "International Labor Law Remedies," National Farmworker Law Conference 2006, Charlotte, NC (November 10, 2006).

Faculty, "Overview of International Labor Law," Workers Rights as Human Rights Conference, Minnesota Advocates for Human Rights 2006 Human Rights Conference and CLE Program, Minneapolis, MN (June 1, 2006).

Co-Planner and Presenter, "Collaboration with Communities and Community Organizations," AALS Annual Conference on Clinical Legal Education, New York, NY (May 3, 2006).

Presenter, "International Framework for Addressing the Right to Civil *Gideon*," 23rd Annual Edward V. Sparer Symposium, University of Pennsylvania Law School, Philadelphia, PA (March 28, 2006).

Invited Speaker/Expert, Special Meeting on the Inter-American Program for the Promotion and Protection of the Human Rights of Migrants, Including Migrant Workers and their Families, coordinated by the Committee on Political and Juridical Affairs of the Organization of American States, Washington, D.C. (March 16, 2006).

Presenter, "Six Million Undocumented Workers: International Human Rights and Organizing in Clinical Legal Education," Sixth International Clinical Conference, Enriching Clinical Education, sponsored by University of California Los Angeles Law School and University of London, Lake Arrowhead, CA (October 27-30, 2005).

Co-Presenter, "Serving Clients Having Limited English Proficiency," Presentations by Bellows Scholars Award Recipients, AALS Annual Conference on Clinical Legal Education, Chicago, IL (May 2, 2005).

Presenter, "Economic and Social Rights of Non-Citizens: Human Rights Principles and the Development of U.S. Policy," sponsored by Law Students for Human Rights, New York University School of Law, New York, NY (March 7, 2005).

Presenter, "The Impact of Globalization on Immigrant Workers: What Happens to an Already Invisible Workforce when their Jobs Disappear?" Symposium on Globalization and the New Politics of Labor, sponsored by INDIANA JOURNAL OF GLOBAL LEGAL STUDIES, Bloomington, IN (February 11-12, 2005).

Co-Planner and Presenter, "Law and Clinics and Law and Organizing," AALS Annual Conference on Clinical Legal Education, San Diego, CA (May 4, 2004).

Moderator, "Immigrant Experiences through the LatCrit Lens," LatCrit IX Conference, Malvern, PA (April 30, 2004).

Presenter, "Legal Rights of Migrant Workers," Migrant and Immigrant Health in Rural Pennsylvania: Putting Migrant Farmworkers First, Co-Sponsored by Pennsylvania Department of Health, Pennsylvania Office of Rural Health, and Pennsylvania Department of Agriculture, State College, PA (September 26, 2003).

Guest Lecturer, "Farmworker Law," and "Outreach to Migrant Workers," Farmworker Legal Aid Clinic, Villanova University School of Law, Villanova, PA (September 2001, January 2002, September 2002).

Awards and Other Honors

Recipient, 2022 Elizabeth Hurlock Beckman Award, "recognizing higher education faculty members who have inspired their students to make a difference in their communities" (sponsored by Wells Fargo Philanthropic Services).

Recipient as Director of the Transnational Legal Clinic, Pennsylvania Immigrant Resource Center (PIRC) Light of Liberty Award (2022).

Honoree, Friends of Farmworkers, Inc. Annual Dinner, June 2004.

Board Memberships

Board of Directors, Centro de los Derechos del Migrante, Inc., Zacatecas, MEXICO (President, February 2009 – December 2021), Founding Member of Board (appointed July 2005).

Member Board of Directors, Friends of Farmworkers, Inc., Philadelphia, PA (June 2007-December 2015), Secretary, Board of Directors (2007-March 2013).

Member, Board of Directors, The African Cultural Alliance of North America (ACANA), Philadelphia, PA (January 2009-2015).

Bar Admissions

U.S. Supreme Court; U.S. Court of Appeals, District of Columbia; U.S. Court of Appeals, First, Third, Eighth, and Ninth Circuits; U.S. District Court, Eastern District, PA; U.S. District Court, Middle District, PA; Pennsylvania; New Jersey; District of Columbia; U.S. Court of Military Commissions Review.

Languages

Spanish (proficient)

EXHIBIT LIST

A	**Email correspondence with ICE**
B	**Letter from the Philadelphia District Attorney's Office**
C	**Medical Records**[1]
D	**Immigration Documents**
E	**Expert Affidavit and Curriculum Vitae from Professor Sarah Paoletti**

[1] Petitioner will subsequently file a motion to file his medical records under seal or protective order given the highly sensitive personal information contained therein. They are therefore not attached here, but will be submitted promptly.