Exhibit A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JENNY LISETTE FLORES, et al., *Plaintiffs,* v. JEFFERSON B. SESSIONS, Attorney General, et al., *Defendants.*	)))))))))))	Case No. 85-4544-DMG (Px) **DECLARATION OF MANOJ GOVINDAIAH, ESQ.**

I, Manoj Govindaiah, declare as follows:

1. I am the Director of Family Detention Services at RAICES, a nonprofit agency that promotes justice by providing free and low-cost legal services to underserved immigrant children, families, and refugees in Texas. RAICES is the largest immigration legal services provider in Texas. As Director of Family Detention Services, I oversee RAICES' work at Texas' family detention centers—in particular, its work at the Karnes County Residential Center in Karnes City, Texas.

2. RAICES visits the Karnes facility four to five times each week provide legal services to families detained there. Families reach us through word of mouth, various sign-up sheets, referrals, and through our Karnes hotline. RAICES provides legal services to an estimated 90% of the families detained at Karnes.

3. RAICES routinely updates and maintains data on our work at Karnes for administrative and other purposes. Our internal statistics show that in the year between July 1, 2017 and June 26, 2018, we provided legal services to 5,177 families units detained at Karnes. Nearly all the families we worked with during

that time period had *bona fide* fears of persecution in their home countries. Indeed, approximately 5,000 family units we served received positive credible fear determinations by an asylum officer or an immigration judge, and were permitted to pursue their asylum claims in immigration court.

4. In contrast, the small minority of families who indicated that they did not have a fear of return received expedited removal orders and were generally deported from the United States within a few days afterwards.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 27th day of June 2018, in San Antonio, Texas.

/s/ *Manoj Govindaiah*
Manoj Govindaiah