

# EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**USAMA JAMIL HAMAMA, et al.,  
Petitioners/Plaintiffs,**

**v.**

**REBECCA ADDUCCI, et al.,  
Respondents/Defendants.**

**Case No. 2:17-cv-11910  
Hon. Mark A. Goldsmith  
Mag. David R. Grand**

**Class Action**

**DECLARATION OF PERLA GONZALEZ**

I, Perla Gonzalez, make the following declaration based on my personal knowledge:

1. I am a legal assistant at the ACLU Foundation of San Diego & Imperial Counties.
2. On August 17, 2018, I spoke by phone with U.S. Immigration and Customs Enforcement Deportation Officer Roderick Kitchens. We spoke about Mr. Nouzat Habib Hanna, A#XXX-XXX-451, an individual detained at the Otay Mesa Detention Center in San Diego, CA. Mr. Hanna had authorized me to discuss his situation with ICE officials.
3. During our phone call, I inquired about ICE's future travel plans for Mr. Hanna, who wants to be deported to Iraq. Mr. Hanna had previously told me that he was scheduled for a flight to Iraq on July 31, 2018, but that on that day he had not been removed.
4. Mr. Kitchens explained to me that on July 31, Mr. Hanna was taken from the Otay Mesa Detention Center to downtown San Diego, in preparation for his flight. However, Mr. Hanna's flight was cancelled because the local ICE travel

unit had received notice that their clearance to fly through Turkey had been denied. Mr. Hanna remains detained at Otey Mesa, awaiting new travel plans.

5. Mr. Kitchens mentioned that ICE's normal practice is to schedule a new flight within a period of 30 days, after one has been canceled, and that Mr. Hanna was supposed to have a new flight scheduled for some time at the end of September. However, he told me, the removal date has been pushed back to an unknown date in October, apparently due to several denied clearances from various unspecified countries. Mr. Kitchens did not have a precise date when Mr. Hanna will be allowed to fly back, but he told me that he has been told it would be some time in October.

I declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing Declaration is true and correct.

Executed this 17th day of August, 2018, in San Diego, California.

Dated: August 17, 2018

ACLU FOUNDATION OF SAN DIEGO  
& IMPERIAL COUNTIES

  
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Perla Gonzalez  
Legal Assistant