EXHIBIT

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- mother was particularly affected by witnessing this brutality because she is older and suffers from hypertension. I have scars on my knee from this assault.
- 4. After beating me, they dragged me by force and detained me for over twenty-four (24) hours with no food and no water. They left me in a cell with another woman who was violent. She beat me and humiliated me in that cell, and they d

became infected with the dengue virus. I suffered a fever and was bed ridden for several days in Tapachula, Mexico. When I recovered, I made my way to Chiapas and from there

copies of tax returns (evidencing an annual income of over)

- officers to enter our dorm and help her. The bread started to burn, and the smoke detectors went off as planned.
- 21. They entered our dorm and took her to the medical unit. One officer told us that the microwave was more valuable than any of us. Since then, she was diagnosed with H1N1 and is in isolation. The only other measure they have taken is that they visit our dorm twice a day to take our temperature.
- 22. We have been under limited quarantine for about a month, with the same set of gloves and the same limited masks. When we ask for replacement gloves and masks, they tell us they do not have any new ones to provide us. All the workers here are coming back inside after contact from the outside world. They do not w_ Rd omicro 1 d

VERIFICATION

I, L P C , am the individual referred to as L.P.C. in the attached declaration.

I declare under penalty of perjury that the foregoing is true and correct.

I have authorized my legal counsel in the *Heredia Mons* litigation to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. I am also foregoing the option to sign documents sent by mail due to the urgency of the COVID-19 situation and due to reasonable fear of destruction of mail or retaliation by officials at this facility. If required to do so, I will provide a signature when I am able.

Date: March 25, 2020

Michelle P. Gonzalez, Esq.

On behalf of witness Laura Perez Carranza

CERTIFICATION

I, Michelle P. Gonzalez, declare that I am proficient in the English and Spanish languages.

On March 25, 2020, I read the foregoing declaration and orally translated it faithfully and

accurately into Spanish over a telephonic call with the declarant. After I completed translating the

declaration, the declarant verified that the contents of the foregoing declaration are true and

accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 25, 2020

Signature