

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Souleymane Dembele, *et al.*,

Petitioners-Plaintiffs,

v.

Bill Prim, *et al.*,

Respondents-Defendants.

Case No. 20-cv-02401

Hon. Joan H. Lefkow

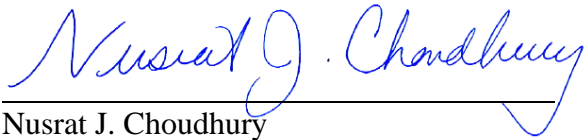
**SUPPLEMENTAL DECLARATION OF NUSRAT J. CHOUDHURY
IN SUPPORT OF PETITIONERS' EMERGENCY PETITION
FOR A WRIT OF HABEAS CORPUS AND MOTION FOR A TEMPORARY
RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION**

I, Nusrat J. Choudhury, declare as follows:

1. I am the Legal Director of the American Civil Liberties Union of Illinois (“ACLU of IL”), and I serve as counsel for the Plaintiffs in this action.
2. I make this Supplemental Declaration based on personal knowledge, and I am competent to testify regarding the following facts.
3. On April 18, 2020, I visited the Coronavirus dashboard of the World Health Organization, which is located at <https://covid19.who.int>. According to this website, as of April 18, 2020, there were 2,164,111 people with confirmed cases of COVID-19 worldwide and 146,198 confirmed deaths from this disease. A true and correct copy of this webpage last visited on April 18, 2020 is attached as Exhibit AG to this declaration.
4. Attached hereto as exhibits are true and correct copies of the following:

Ex.	Document
AG	World Health Org., <i>Coronavirus Disease (COVID-19) Pandemic</i> , https://www.who.int/emergencies/diseases/novel-coronavirus-2019 (last visited Apr. 18, 2020).
AH	Ctrs. for Disease Control and Prevention, <i>Coronavirus Disease 2019 (COVID-19): Cases in the US</i> , https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html (last visited April 18, 2020).
AI	State of Ill., <i>Coronavirus (COVID-19) Response, Coronavirus Disease 2019 (COVID-19)</i> , https://coronavirus.illinois.gov/s/ (last visited April 18, 2020).
AJ	McHenry Cty. Dep't. of Health, <i>COVID-19 (Novel Coronavirus)</i> , https://www.mchenrycountyil.gov/county-government/departments-a-i/health-department/covid-19-novel-coronavirus (last visited Apr. 18, 2020).
AK	J. David McSwane, <i>ICE Has Repeatedly Failed to Contain Contagious Diseases, Our Analysis Shows. It's a Danger to the Public</i> , ProPublica (Mar. 20, 2020), https://www.propublica.org/article/ice-has-repeatedly-failed-to-contain-contagious-diseases-our-analysis-shows-its-a-danger-to-the-public .
AL	Chief Justice Mike McGrath, Letter to Montana Courts of Limited Jurisdiction (Mar. 20, 2020), <i>available at</i> https://courts.mt.gov/Portals/189/virus/Ltr%20to%20COLJ%20Judges%20re%20COVID-19%20032020.pdf .
AM	<i>DHS Officials Refuse to Release Asylum Seekers and Other Non-Violent Detainees Despite Spread of Coronavirus</i> , House Committee on Oversight and Reform (April 17, 2020), https://oversight.house.gov/news/press-releases/dhs-officials-refuse-to-release-asylum-seekers-and-other-non-violent-detainees .
AN	Priscilla DeGregory, <i>Coronavirus shuts down some NYC and NJ immigration courts</i> , N.Y. Post (Mar. 24, 2020), https://nypost.com/2020/03/24/coronavirus-shuts-down-some-nyc-and-nj-immigration-courts .
AO	Chuck Goudie, et al., <i>Coronavirus danger escalating behind bars at some Illinois prisons, jails</i> , ABC 7 (April 10, 2020), https://abc7chicago.com/health/coronavirus-danger-escalating-behind-bars-at-some-illinois-prisons-jails/6093868 .
AP	<i>306 Cook County Jail Inmates Have Tested Positive, 5 Stateville Prison Inmates Have Died Of COVID-19</i> , CBS Chicago (April 13, 2020), https://chicago.cbslocal.com/2020/04/13/306-cook-county-jail-inmates-have-tested-positive-5-stateville-prison-inmates-have-died-of-covid-19 .

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed in Chicago, Illinois on this 21st day of April, 2020.



Nusrat J. Choudhury
NY Reg. No. 4538302
Appearing Pro Hac Vice

CERTIFICATE OF SERVICE

I, Nusrat J. Choudhury, an attorney, hereby certify that I caused a true and correct copy of the foregoing SUPPLEMENTAL DECLARATION OF NUSRAT J. CHOUDHURY IN SUPPORT OF PETITIONERS' EMERGENCY PETITION FOR A WRIT OF HABEAS CORPUS AND MOTION FOR A TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION to be served upon the following counsel for the Defendants via email on April 21, 2020:

For Defendants Chad Wolf, Matthew Albence and Robert Guadian:

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I further certify that I will attempt personal service of the foregoing to be served upon all Defendants on April 21, 2020.

/s/ Nusrat J. Choudhury