

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LIYANARA SANCHEZ, as next friend
on behalf of FRENGEL REYES MOTA,
et al.,

Petitioner,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Respondents.

Civil Action No. 1:25-cv-00766-JEB

DECLARATION OF DREW C. ENSIGN

I, Drew C. Ensign, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

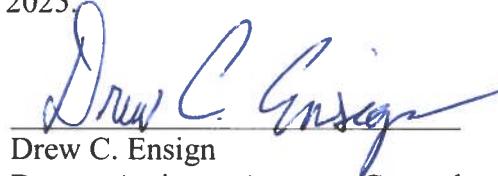
1. I am a Deputy Assistant Attorney General in the Civil Division of the U.S. Department of Justice (DOJ) and have served in that position since January 2025. I am a counsel of record for Respondents in this action.
2. I argued on behalf of Respondents at the TRO hearings in the late afternoon on March 15, 2025, which began at 5 pm, recessed at 5:22 pm, and resumed at 6:00 pm.
3. After the hearing concluded, I summarized for DHS senior staff what this Court had stated on the record at the hearing. I also promptly informed DOJ senior staff of the same.
4. At 7:26pm, I received an email from this Court's ECF system that included the Court's written minute order. I forwarded that email to DHS senior staff and the Office of the Legal Advisor at the Department of State. I also notified DOJ senior staff of the written order.
5. Beyond conveying this Court's oral directives and written order, I did not provide any legal advice to DHS regarding what the TRO required or what actions might be consistent

with it before the decision was made to transfer custody of the aliens who had been removed from the United States before the Court's order. I was also not involved in any discussions with DOJ leadership regarding any legal advice given to DHS on that topic. I did not learn of the decision to proceed with the transfer of custody for the previously removed aliens until after that decision had been made.

6. Almost immediately after the Court's minute order issued, I was instructed to appeal the TRO and seek a stay pending appeal of that order. I began working on that stay motion immediately. That stay motion was filed with the D.C. Circuit around 1 am on March 16.

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

Executed this 10th day of December 2025.



Drew C. Ensign
Deputy Assistant Attorney General
U.S. Department of Justice