UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

DANBURY AREA COALITION FOR THE RIGHTS OF IMMIGRANTS; EDUADORIAN CIVIC CENTER OF DANBURY; JUNTA FOR PROGRESSIVE ACTION, INC.; UNIDAD LATINA EN ACCION; and NATIONAL IMMIGRATION PROJECT OF THE NATIONAL LAWYERS GUILD, INC.,	)	
	)	Civil No.: 3:06CV1992(RNC)
Plaintiffs,	)	
v.	)	
U.S. DEPARTMENT OF HOMELAND SECURITY,	)	
Defendant.	)	
	)	October 24, 2007

MEMORANDUM IN OPPOSITION TO DEFENDANT'S EMERGENCY MOTION FOR PROTECTIVE ORDER

The Plaintiffs respectfully submit this memorandum in opposition to Defendant's emergency motion for a protective order precluding Plaintiffs from deposing Richard McCaffrey, Supervisory Detention and Deportation Officer with U.S. Department of Homeland Security ("DHS"), Bureau of Immigration and Customs Enforcement ("ICE" or "the Agency"), and another witness from DHS to be designated under Rule 30(b)(6). For the reasons set forth below, the Court should deny the Defendant's motion and enter an order compelling DHS and Mr. McCaffrey to comply with the depositions noticed and subpoenaed, respectively, by Plaintiffs. In the alternative, Plaintiffs respectfully request that the Court set an expedited schedule for DHS's proposed summary judgment motion.

BACKGROUND

This is an action arising under the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). Plaintiffs submitted a request to DHS for certain records on October 24, 2006 – nearly a full year ago – and received no response within the statutory time period. See Docket Entry #1, Compl. Exh. A, *FOIA Request dated Oct. 24, 2006*. On December 14, 2006, Plaintiffs filed the instant Complaint seeking to compel the release of the requested documents.[1] See id.

The lawsuit has progressed slowly, however, because DHS has repeatedly engaged in dilatory tactics. DHS requested, and out of courtesy Plaintiffs agreed to, two initial extensions of time to respond to the Complaint. See Docket Entries ## 9 and 11. DHS finally responded to Plaintiffs' nine-page Complaint with a groundless motion to strike certain paragraphs and subheadings, see Docket Entry # 13, Mot. to Strike, thereby extending their time to answer, Fed.R.Civ.P. 12(f). Chief Judge Chatigny denied the motion to strike, but DHS still has not yet filed an Answer, though its time to do so is long overdue.

Plaintiffs eventually moved for a Preliminary Injunction to compel DHS to respond to the portion of the Plaintiffs' request specifically related to the September 19, 2006 undercover sting operation. See Docket Entry # 21. In May, 2007, Chief Judge Chatigny held two telephonic conferences, during which DHS stated that it had located no records other than the individual "A files" for the men arrested on September 19, 2006. Because DHS had failed to locate numerous records ordinarily created in an operation such as the September 19, 2006 arrests, Plaintiffs

[1] Plaintiffs sought to compel the release of records on a matter of public concern, namely ICE immigration enforcement activities in Danbury, Connecticut, including ICE's cooperation with local elected officials and the Danbury Police Department. In addition to records relating generally to these topics, Plaintiffs sought to compel the release of records regarding a particular undercover sting operation targeting day laborers, which was carried out on September 19, 2006 in Danbury. See Docket Entry #1, Compl. ¶¶ 26-29. Defendant has thusfar produced redacted versions of the requested alien files ("A files") for nine of the eleven day laborers arrested on September 19, 2006. This motion, and the depositions themselves, relate only to (1) operational records related to the September 19, 2006 operation and (2) other records related to ICE's immigration enforcement in Danbury. This motion and the depositions do not address the search for or production of the individual A files.

objected that DHS had violated its statutory obligation under FOIA to conduct a reasonable search for responsive records. See Docket Entry #29, Status Report of Sept. 24, 2007, Ex. F, *Letter to Ms. Perkins from Michael Wishnie and Geri Greenspan dated May 23, 2007.* Despite Plaintiffs' efforts to resolve the "reasonable search" issue over the summer, DHS refused to produce a detailed and non-conclusory declaration that would establish the adequacy of its search. See Docket Entry #29, Status Report of Sept. 24, 2007, Ex. H, *Letter to Michael Wishnie and Geri Greenspan from Ms. Perkins dated August 7, 2007.*

Plaintiffs seek the depositions that are the subject of Defendant's present motion[2] in an effort to resolve the issue of the lawfulness of DHS's search for responsive records, which by statute must be a "reasonable" search. These two narrow depositions would likely provide information that would facilitate the settlement of the issue without additional intervention from this Court. Specifically, the information obtained through the depositions would either establish the reasonableness of the agency's search, or would allow Plaintiffs to identify additional searches that could be expected to locate responsive records. Plaintiffs would be amenable to a settlement of the search dispute wherein DHS would perform the additional searches and produce any responsive, non-exempt records located as a result. In fact, this is precisely what occurred in a parallel proceeding under the Connecticut Freedom of Information statute in which Plaintiffs sought records from the Danbury Police Department related to the same September 19, 2006 arrests: Plaintiffs questioned Danbury police officials under oath in a state administrative proceeding, identified additional searches that had not been performed but were likely to yield

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[2] Plaintiffs subpoenaed the deposition of ICE Officer Richard L. McCaffrey, a Supervisory Special Agent who was present at the September 19, 2006 arrests in Danbury, and would therefore have personal knowledge as to (1) the records typically created in such an operation and (2) the records actually created in the September 19, 2006 operation. In addition, Plaintiffs noticed the deposition of a DHS employee to be designated under Fed. R. Civ. P. 30 (b)(6), who could testify as to (1) DHS recordkeeping systems and (2) the actual search conducted by the Agency in response to Plaintiffs' original FOIA request. See Memo in Support of Def.'s Emergency Motion for Protective Order, Ex. F.

further responsive records, and swiftly settled the action with an agreement by Danbury to undertake the limited additional searches identified through the testimony. See Wishnie Decl., Ex. L, *email from Elizabeth Simpson to Victor Perpetua dated April 20, 2007.*

In the instant case, by letter dated September 7, 2007, DHS informed Plaintiffs that it had concluded its search and that, in addition to the individual A files for nine of the men arrested on September 19, 2006, DHS had identified eight pages responsive to the remainder of Plaintiffs' original request.[3] See Docket Entry #29, Status Report of Sept. 24, 2007, Ex. B, *Letter to Michael Wishnie from Catrina M. Pavlik-Keenan dated Sept. 7, 2007.* Because the agency has now concluded its search, there is no longer any reason to delay the resolution of Plaintiffs' challenge to the lawfulness of the DHS search.[4]

Meanwhile, Plaintiffs' need for the requested documents remains urgent. Nine men arrested in the September 19, 2006 sting operation are in removal proceedings before Immigration Judge Michael W. Straus in Hartford, Connecticut. Some of the men who were arrested on September 19, 2006 are members of the Plaintiff organizations, and as such, Plaintiffs have an interest in ensuring that those men are able to competently defend themselves in immigration court. The defense the men are raising essentially requires a showing that the federal and local law enforcement agents involved in the arrests acted unlawfully; the records sought by Plaintiffs are essential to this defense.

In addition, ICE continues significant enforcement operations in Danbury, where immigration remains a contentious local issue. See Wishnie Decl., Ex. G, "ICE Arrests 6 Immigrants in Danbury"; Ex. H, "Candidates for Danbury Mayor Spar." The Plaintiffs in

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[3] One of these pages, an ICE press statement mentioning Danbury but not the September 19, 2006 arrests, was produced, and the remaining seven pages were withheld pursuant to various statutory exemptions.

[4] Additionally, Attorney Perkins verbally represented to Plaintiffs on September 13, 2007 that Defendant could produce a Vaughn index within a couple of weeks. However, to date, Defendant has not produced a Vaughn index describing the seven pages withheld.

particular, and the public at large, have a substantial interest in ensuring that ICE enforcement operations in Danbury are lawful and comply with the agency's own detailed procedures.

ARGUMENT

I. Plaintiffs are Entitled to Discovery in This Case.

It is undisputed that Defendant DHS has a statutory obligation to undertake a reasonable search for records responsive to Plaintiffs' FOIA request. See 5 U.S.C. §§ 552(a)(3)(C)(B), (C); Founding Church of Scientology of Washington v. NSA, 610 F.2d 824 (D.C. Cir. 1979). "Reasonableness" is a question of fact, and courts have not hesitated to order limited discovery to test an agency's factual claim that it has satisfied the statutory command and conducted an adequate search. DHS claims to have located a total of only eight pages responsive to Plaintiffs' request for operational records regarding ICE activities in Danbury. DHS cannot evade its statutory obligation to conduct an adequate search, and limited discovery is fully appropriate in this case.

a. FOIA Plaintiffs are Entitled to Discovery.

Plaintiffs in FOIA cases are entitled to discovery, and the Federal Rules of Civil Procedure are fully applicable. See, e.g., Local 3, Intern. Broth. of Elec. Workers, AFL-CIO v. N.L.R.B., 845 F.2d 1177, 1179 (2d Cir. 1988) ("Discovery in a FOIA action is permitted in order to determine whether a complete disclosure of documents has been made and whether those withheld are exempt from disclosure."); Founding Church of Scientology of Washington v. NSA, 610 F.2d 824, 833 n.75 (D.C. Cir. 1979) (in FOIA suit, explaining "interrogatories and depositions are especially important in a case where one party has an effective monopoly on the relevant information.").

Discovery in FOIA cases is particularly appropriate in determining the reasonableness of an agency's search for responsive records. See, e.g., Giza v. Secretary of Health, Education & Welfare, 628 F.2d 748, 751 (1st Cir. 1980) ("[Discovery in a FOIA action] is directed at determining whether complete disclosure has been made, e.g., whether a thorough search for documents has taken place, whether withheld items are exempt from disclosure."). See also Founding Church of Scientology, 610 F.2d at 836.("[I]f, in the face of well-defined requests and positive indications of overlooked materials, an agency can so easily avoid adversary scrutiny of its search techniques, the [Freedom of Information] Act will inevitably become nugatory.").

A fundamental principle in civil cases is that "the deposition-discovery rules are to be accorded a broad and liberal treatment," Schlagenhauf v. Holder, 379 U.S. 104, 114-115 (1964) (citing Hickman v. Taylor, 329 U.S. 495, 507 (1947); see also Ratliff v. Davis Polk & Wardwell, 354 F.3d 165, 170 (2d Cir. 2003) (same). The Freedom of Information Act, 5 U.S.C. § 552, does nothing to alter this fundamental principle.

As a general matter, discovery is broad, "encompass[ing] any matter that bears on, or that reasonably could lead to other matter that could bear on, any issue that is or may be in the case." Maresco v. Evans Chemetics, Div. of W.R. Grace & Co., 964 F.2d 106, 114 (2d Cir. 1992), citing Oppenheimer Fund, Inc. v. Sanders, 437 U.S. 340, 351 (1978). Freedom of Information Act cases are governed by the Federal Rules of Civil Procedure, and warrant no exception to the discretionary nature of discovery. See, e.g., Miscavige v. IRS, 2 F.3d 366, 369 (11th Cir. 1993) (disposition of motions for discovery and leave to take a deposition were "within the discretion of the court.").

Contrary to the assertions of Defendant, a showing of bad faith on the part of the agency is not required to justify discovery, even after an agency has moved for summary judgment and

has submitted affidavits. Where the agency's affidavits describing the search are insufficiently detailed and conclusory, a court may allow discovery to determine the reasonableness of the search. See Long v. U.S. Department of Justice, 10 F.Supp.2d 205, 210 (N.D.N.Y. 1998) (granting discovery because the defendant's "affidavits do not reasonably outline the method of the search to a degree which shows that all likely responsive files were searched, therefore, discovery is needed."); Citizens for Responsibility and Ethics in Washington v. U.S. Dept. of Justice, 2006 WL 1518964, *3 (D.D.C. 2006) (ordering the deposition of four federal officials to allow plaintiff to investigate adequacy of federal agency's FOIA search).

b. The Limited Discovery Sought by Plaintiffs is Warranted

Plaintiffs in the instant case seek only limited discovery as to the reasonableness and adequacy of the search conducted by DHS in response to their underlying FOIA request. In such circumstances, discovery is appropriate and justified. See Citizens for Responsibility and Ethics in Washington v. U.S. Department of Justice, 2006 WL 1518964, *6 (D.D.C. 2006) (ordering discovery in a FOIA case where warranted by the facts of the case); Litton Industries, Inc. v. Lehman Bros. Kuhn Loeb, Inc., 124 F.R.D. 75, 78 (S.D.N.Y. 1989) (allowing expedited depositions where they "would fulfill the purposes of Rule 16 of the Federal Rules of Civil Procedure by (1) expediting the disposition of the litigation; (2) establishing case control so as to avoid protracting the litigation through lack of management; (3) discouraging wasteful pretrial activities; and (4) facilitating settlement of the case.").

In this case, Plaintiffs seek limited discovery in the interest of a speedy resolution of the case and in order to facilitate the settlement of the case. Plaintiffs have reason to believe that, according to the agency's own internal protocols and practices, other documents in addition to those contained in the A files are likely to exist.

First, ICE's internal procedures for undercover sting operations require the agents involved to produce a Memorandum for Approval of Undercover Sting Operation and a Closing Report for Undercover Sting Operation. See Wishnie Decl., Ex. A, "INS Authorization Procedures for 'Sting' Operations"; Ex. B, "Attorney General's Guidelines on INS Undercover Operations." It is undisputed that in this case, an undercover law enforcement agent posing as a contractor invited day-laborers in Danbury into his vehicle and drove them to a parking-lot where they were arrested and eventually turned over to ICE for removal proceedings. See Wishnie Decl., Ex. E, *Department of Homeland Security's Response Brief*.[5] It is implausible that ICE would run a substantial undercover operation but create none of the records required by its longstanding agency rules.

Second, Assistant Secretary of Homeland Security for ICE, Julie Myers, has stated that Fugitive Operations Teams generally produce an "operational plan" and are required to submit that plan to headquarters for written approval. See Wishnie Decl., Ex. D, *Letter from Julie Myers, Assistant Secretary of DHS, to Christina DeConcinic, National Immigration Forum*, dated July 6, 2007. The ICE agents who participated in the September 19, 2006 Danbury arrests were members of the ICE Fugitive Operations Team, yet ICE claims that its search has failed to identify either a pre-operational plan or headquarters approval, as routinely required.

Third, when conducting their investigations, ICE agents routinely use a number of standard forms. Plaintiffs' underlying FOIA request specifically referenced a number of these forms, yet ICE's search has apparently failed to locate any such record for any ICE enforcement operation in Danbury in the time period applicable to Plaintiffs' request. It is simply implausible that a reasonable search would fail to locate any of the following:

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[5] The identity of the vehicle's driver is unknown to Plaintiffs, but whether the driver was a Danbury Police officer, as ICE contends, Wishnie Dec., Ex. E, or the sting was an ICE operation, as Danbury police officials claim, Wishnie Dec., Ex. F, is immaterial, because ICE's guidelines for undercover operations apply in either circumstance.

a. A G-166C Memorandum of Investigation form, which records significant conversations, leads, and other investigatory developments. See Wishnie Decl., Ex. K, *Deposition of William Riley.*[6] The planning and investigation stages of an operation may be reconstructed from these forms. See, e.g., Wishnie Decl., Ex. C, *letter from Michael Chertoff, Secretary of Homeland Security, to Senator Christopher Dodd*, at 3 (explaining the investigation and planning process of another ICE raid).

b. A Form G-123A, on which ICE initial investigatory leads, or "tips," are records. See Wishnie Decl., Ex. J, In re: Herrera Priego, at 2; Ex. K, *Deposition of William Riley* (providing examples of actual G-123A forms).

c. A Form G-600, or case-opening form for immigration investigations. See Wishnie Decl., Ex. K, *Deposition of William Riley.*

d. A Form G-164, or case-closing form for immigration investigations. See Wishnie Decl., Ex. K, *Deposition of William Riley.* In their search, ICE claims not to have located any G-123A, G-166C, G-164, or G-600 forms, or their functional equivalent.

The September 19, 2006 arrests were the result of an undercover sting operation, instigated by a tip from Danbury police to ICE regarding the presence of immigration law violators in Danbury. Thus, it was the type of operation in which the above-described documents were likely to have been produced.

Further, Danbury officials assert that the operation was planned and executed by ICE. Detective Lieutenant James Fisher testified under oath at a hearing of the Connecticut Freedom

[6] The form numbers listed herein refer to standard investigatory forms used by the former U.S. Immigration and Naturalization Service (INS), whose primary enforcement functions have been assumed since March 1, 2003 by the Bureau of Immigration Customs and Enforcement (ICE). ICE continues to use many INS forms, however, and Plaintiffs are unaware that ICE has abandoned use of these.

of Information Commission that ICE agents, not Danbury Police Officers, planned and made the arrests. See Wishnie Decl., Ex. F, *Testimony of James Fisher*. The Mayor of Danbury, Mark Boughton, and Danbury Police Chief Al Baker have said publicly that the arrests were the result of an ICE operation and that Danbury was not involved in the planning or execution of the operation. See Wishnie Decl., Ex. I, "'Danbury 11' lawsuit filed."

Contrary to the Defendant's assertion on this motion, Plaintiffs do not rely on either the interim Declaration of Ms. Taylor, Docket Entry #29, Status Report of Sept. 24, 2007, Ex. E, or the draft Vaughn Index provided to Plaintiffs, Docket Entry #29, Status Report of Sept. 24, 2007, Ex. A, to make an assertion of bad faith on the part of the agency. Rather, Plaintiffs challenge the reasonableness of the agency's search based on the fact that the search has now concluded and records that are likely to exist were not located during the search. To the extent, however, that statements by senior Danbury elected and police officials (regarding the primacy of ICE's role in the September 19, 2006 arrests) contradict ICE's own statements (insisting that few responsive records have been identified because the arrests were carried out by Danbury police), this Court may reasonably conclude that the record contains evidence of bad faith in the conduct of this FOIA search.

Fundamentally, Plaintiffs seek discovery at this stage in order to quickly resolve this action, as an alternative to lengthy briefings and hearings on motions and cross-motions for summary judgment. For instance, in order to meet their burden in a motion for summary judgment and be granted a FOIA exception, defendants are required to submit detailed and nonconclusory affidavits. See SafeCard Services, Inc. v. SEC, 926 F.2d 1197, 1200 (D.C. Cir. 1991) (holding that "[i]n order to establish the adequacy of a search" sufficient to prevent discovery, "agency affidavits must be … relatively detailed and non-conclusory, and …

submitted in good faith.") (internal quotation omitted); National Parks & Conservation Ass'n v. Kleppe, 547 F.2d 673, 680 (D.C. Cir. 1976) (holding that conclusory and generalized allegations are unacceptable as means of sustaining the burden of nondisclosure). Given the limited nature of the dispute, the pressing nature of the interests involved, and the already overlong duration of this suit, it is strongly in the interest of judicial economy to resolve the dispute by discovery at this stage, rather than protracted and unnecessary motions practice.

Plaintiffs submitted their FOIA request nearly a full year ago. At every step, Plaintiffs have diligently sought to ensure that this case progressed in an orderly fashion. However, nearly a year after Plaintiffs submitted their initial request, DHS still manages to prolong the resolution of this matter. The delays in this case have prejudiced the Plaintiffs by preventing them from aiding their members in their ongoing proceedings in immigration court or by subjecting ICE enforcement operations in Danbury to the public scrutiny that FOIA compels. The records sought by Plaintiffs are essential to that goal.

II. Defendant has not Shown Good Cause Why Discovery should not Proceed.

a. Standard of Review.

A protective order may be issued only where the movant demonstrates good cause for protection of the information or material sought. Jerolimo v. Physicians for Women, P.C., 238 F.R.D. 354, 356 (D.Conn. 2006) (citations omitted). Good cause must be shown through "a particular and specific demonstration of fact, as distinguished from stereotyped and conclusory statements." Id. (quotations and citation omitted). Even if the movant establishes good cause, the court must still "balance the countervailing interests to determine whether to exercise discretion and grant the order." Id. (quotations and citation omitted).

In this case, the balance of the countervailing interests weighs heavily in favor of allowing discovery. Plaintiffs have a statutory right to obtain the documents which they requested, and Plaintiffs cannot be satisfied that they have received such records until the agency satisfies its statutory burden of proving the reasonableness of its search. Plaintiffs seek limited discovery in the form of two depositions, which will be neither overly burdensome nor unduly prejudicial to DHS. DHS has not shown with the specificity required that there is good cause to grant a protective order in this case.

b. The Depositions Sought Do Not Impose an Undue Risk of Prejudice

Defendant overstates the risk of "undue prejudice" that DHS would face in a limited deposition as to Plaintiffs' FOIA request. "The Second Circuit has yet to define the term 'undue prejudice.' Elsewhere it has been construed to mean 'improper or unfair treatment' rising to a level somewhat 'less than irreparable harm.'" Faulkner v. Verizon Communs., Inc., 156 F. Supp. 2d 384, 402 (S.D.N.Y. 2001) (citations omitted). It would be neither improper nor unfair to allow the depositions sought by Plaintiffs, and the depositions would certainly not result in undue prejudice to either DHS or Mr. McCaffrey.

The depositions sought by Plaintiffs are proper. Plaintiffs seek from the depositions precisely what they have been seeking for many months: to establish the reasonableness of the Agency's search for records responsive to their original FOIA request – made nearly one year ago. Officer McCaffrey is one of only three ICE officers known to be present at the undercover sting operation on September 19, 2006, and therefore one of only three individuals who would have personal knowledge as to what pre- and post-operation ICE documents were created. Further, all three ICE officers with personal knowledge of documents created are named as defendants in Barrera. Id. ¶¶ 266-297. For Plaintiffs to have meaningful access to the

information in the possession of DHS regarding the agency's search, one of those three officers must testify regarding (1) the records typically created in an operation such as that which resulted in the September 19, 2006 Danbury arrests and (2) the records actually created by the agency in connection with that operation.

Defendant DHS would not suffer undue prejudice as a result of the depositions sought by Plaintiffs. First, DHS is not itself a defendant in Barrera v. Boughton, 3:07cv1436(RNC). Second, the topics to be covered in the proposed deposition – the records created in connection with ICE enforcement activities in Danbury, including the arrests of September 19, 2006, and the agency's search for such records – are material to this FOIA dispute, but do not particularly bear on the claims and defenses at issue in the *Bivens* claims in Barrera. Third, Agent McCaffery would not be prejudiced because Plaintiffs have agreed to postpone the depositions pending the resolution of Defendant's Motion for Protective Order, thereby allowing Agent McCaffery sufficient time to obtain private counsel to represent him at the deposition. Thus, it is entirely speculative to suggest that Agent McCaffery will suffer prejudice as a result of the deposition.

Finally, if anything, it would be improper and prejudicial to Plaintiffs if they were denied the sort of limited discovery typically allowed in "reasonable search" disputes in FOIA cases, simply because one deponent was also a defendant in a *different* action brought by *different* plaintiffs raising *different* claims. DHS's assertions that Mr. McCaffery's testimony in this case would prejudice him in the Barrera case are mere speculation. Officer McCaffrey is but one of more than twenty-five defendants in Barrera, an action brought by plaintiffs different from Plaintiffs herein.

III. Plaintiffs Move the Court to Enter an Order to Compel Defendant to Attend and Cooperate with the Depositions Plaintiffs Have Sought

As set forth above, Plaintiffs are entitled to discovery in general, discovery is warranted on the particulars of the case at bar, and the limited discovery sought by Plaintiffs is justified in the interest of judicial economy and of the speedy resolution of this case without recourse to lengthy briefing and the submission of detailed affidavits. Plaintiffs therefore move the court to enter an order to compel Defendant to attend and cooperate with the depositions they have sought.

IV. Plaintiffs Move the Court to Set a Deadline by Which Defendant Must File Any Motion for Summary Judgment.

In the alternative, should this Court grant Defendant's emergency motion, Plaintiffs respectfully request that this Court set an expedited briefing schedule and require DHS to file a Motion for Summary Judgment with accompanying affidavits and Vaughn indices.

CONCLUSION

For the forgoing reasons, Plaintiffs respectfully request that the Court deny Defendant's emergency motion for a protective order and instead enter an order compelling compliance with the duly noticed and subpoenaed depositions. In the alternative, Plaintiffs respectfully request that this Court set an expedited briefing schedule.

Respectfully Submitted,

By:______/s/____________________________

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