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11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE EASTERN DISTRICT OF CALIFORNIA
 13 SACRAMENTO DIVISION

15 **THE UNITED STATES OF AMERICA,**

16 Plaintiff,

17 v.

19 **THE STATE OF CALIFORNIA; EDMUND
 20 GERALD BROWN JR., Governor of
 California, in his official capacity; and
 21 XAVIER BECERRA, Attorney General of
 California, in his official capacity,**

22 Defendants.

Case No. 2:18-cv-00490-JAM-KJN

**DEFENDANTS' NOTICE OF FILING OF
 CORRECTED DECLARATION**

Judge: Honorable John A. Mendez
 Action Filed: March 6, 2018

1 Defendants respectfully submit this Notice of Filing of Corrected Declaration in order to
2 correct the record for the Court with respect to two facts set forth in the Declaration of Tom K.
3 Wong (Wong Declaration), filed May 4, 2018, in support of Defendants' Opposition to Plaintiff's
4 Motion for Preliminary Injunction in the above-captioned case and docketed on the Court's
5 electronic case filing system (ECF) as Document 75-7. The attached Supplemental Declaration
6 of Tom K. Wong explains that during his May 30, 2018 deposition, he found two errors in
7 paragraph 11 of his declaration. First, Dr. Wong inadvertently included the word "not" in a
8 sentence stating in relevant part that "six [California counties] are characterized as not willing to
9 accept detainer requests," in paragraph 11, line 14. This part of the sentence simply summarizes
10 the underlying ICE data that forms the basis of Dr. Wong's analysis described in paragraphs 9
11 through 24 and does not change the substance of his conclusions in the declaration. In addition,
12 in line 17 of paragraph 11, the date of which the FOIA data were current is December 2016, not
13 December 2015. Those corrections have been made in paragraph 11 of the attached Amended
14 Declaration. The date of signing has also been changed. No other changes to the Wong
15 Declaration have been made nor have any changes been made to the exhibit attached to that
16 declaration.

17
18 Dated: June 6, 2018

Respectfully Submitted,

19 XAVIER BECERRA
20 Attorney General of California

21
22 /s/Christine Chuang
23 Christine Chuang
24 Deputy Attorney General
25 *Attorneys for Defendants*
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