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

15 **THE UNITED STATES OF AMERICA,**

17 Plaintiff,

18 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

**SUPPLEMENTAL DECLARATION OF**  
**TOM K. WONG IN SUPPORT OF**  
**DEFENDANTS' OPPOSITION TO**  
**PLAINTIFF'S MOTION FOR**  
**PRELIMINARY INJUNCTION**

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

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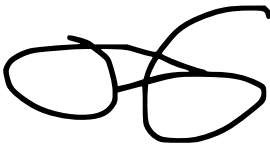
I, Tom K. Wong declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would testify competently to the matters set forth below.

2. I was deposed on May 30, 2018.

3. During the deposition, I discovered two errors in need of correcting. Both of these are in paragraph 11. First, in paragraph 11, line 14, I inadvertently included the word “not” in the sentence stating, “six [California counties] are characterized as not willing to accept detainer requests.” This part of the sentence simply summarizes the ICE dataset that I used in my analysis, which is described in paragraphs 9 through 24, and thus does not change the substance of my conclusions. The second error that needs correcting is in paragraph 11, line 17. The FOIA data were current as of December 2016, not December 2015.

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 on June 4, 2018 in San Diego, California.



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TOM K. WONG