

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

TEYANA GIBSON BROWN, *et al.*,
Plaintiffs,

v.

MARKWAYNE MULLIN, *in his official
capacity as Secretary of the Department of
Homeland Security, et al.*,
Defendants.

Case No. 1:26-cv-1131-TSC

DECLARATION OF KRISTY PARKER

I, Kristy Parker, an attorney admitted to practice before this Court, do hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice in the District of Columbia. I represent Plaintiffs in the above-captioned matter.
2. I submit this declaration and its attachments in support of Plaintiffs' Opposition to Defendants' Motion for Extension of Responsive Pleading Deadline.
3. The facts set forth herein are based upon my personal knowledge or a review of the files in my possession.
4. Attached hereto is a true and correct copy of email correspondence between counsel for Defendants and me.

Dated: May 29, 2026
Fairfax Station, Virginia

/s/ 

Kristy Parker, D.C. Bar No. 1542111

Protect Democracy Project

2020 Pennsylvania Ave NW

Washington DC 20006

Tel: (202) 579-4582

kristy.parker@protectdemocracy.org



Kristy Parker <kristy.parker@protectdemocracy.org>

RE: [EXTERNAL] Re: Gibson Brown v. Mullin, No. 1:26-cv-1131

1 message

Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov>

Thu, May 21, 2026 at 2:56 PM

To: Kristy Parker <kristy.parker@protectdemocracy.org>

Cc: "shalini.agarwal@protectdemocracy.org" <shalini.agarwal@protectdemocracy.org>, "ashah@acludc.org" <ashah@acludc.org>, "mperloff@acludc.org" <mperloff@acludc.org>, "Snead, Jacqueline Coleman (CIV)" <Jacqueline.Snead@usdoj.gov>

Kristy,

We will be filing a motion for extension today as we previously discussed—for three months with submissions of JSRs every 30 days in the interim. We cannot agree at this time to the terms you proposed on Monday.

We will represent that you oppose our motion unless we hear differently from you by 5:00 p.m. today.

Thank you,

J. Stephen Tagert

U.S. Department of Justice | Civil Division (Federal Programs Branch)

Email Address: stephen.tagert@usdoj.gov

Phone: (202) 305-5486



From: Kristy Parker <kristy.parker@protectdemocracy.org>

Sent: Thursday, May 21, 2026 11:43 AM

To: Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov>

Cc: shalini.agarwal@protectdemocracy.org; ashah@acludc.org; mperloff@acludc.org; Snead, Jacqueline Coleman (CIV) <Jacqueline.Snead@usdoj.gov>

Subject: Re: [EXTERNAL] Re: Gibson Brown v. Mullin, No. 1:26-cv-1131

Dear Stephen --

not seeking an extension in a substantially similar case in SDTx: Garcia v. Noem (7:26-cv-00085), where the government indicated it intended to file an MTD shortly. Given that the agency is able to litigate these legal issues notwithstanding that the same policy is allegedly "paused," we assume you will no longer be filing your motion for extension in our case.

Best,

Kristy

Kristy Parker

Special Counsel

Protect Democracy

On Mon, May 18, 2026 at 8:16 PM Kristy Parker <kristy.parker@protectdemocracy.org> wrote:

Dear Stephen --

We cannot agree to any extension without basic information to show how the Secretary has implemented and communicated the claimed "pause," and assurances that our clients will not be adversely affected. Specifically, what guidance, if any, has been communicated within DHS regarding the described pause, and how is the pause being enforced within the agency? And can you commit to notifying us and the Court 30 days prior to reimplementing of the policy?

We are available to meet and confer by telephone tomorrow.

Best,

Kristy

Kristy Parker

Special Counsel

Protect Democracy

On Mon, May 18, 2026 at 3:02 PM Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov> wrote:

Your attachment(s) were cleaned by Check Point Sandblast Threat Extraction.

[Click here](#) to restore the original(s).

Kristy,

for a three-month extension with JSRs every thirty days in the interim. Please let us know whether you consent by COB tomorrow, Tuesday, May 19.

Thank you,

J. Stephen Tagert

U.S. Department of Justice | Civil Division (Federal Programs Branch)

Email Address: stephen.tagert@usdoj.gov

Phone: (202) 305-5486



From: Kristy Parker <kristy.parker@protectdemocracy.org>
Sent: Thursday, May 14, 2026 5:30 PM
To: Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov>
Cc: shalini.agarwal@protectdemocracy.org; ashah@acludc.org; mperloff@acludc.org; Snead, Jacqueline Coleman (CIV) <Jacqueline.Snead@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Gibson Brown v. Mullin, No. 1:26-cv-1131

Dear Counsel,

We have some questions and concerns as we consider your request for an extension of time. First, what does it mean that DHS is “pausing” the use of administrative warrants to enter homes, as referenced in the Secretary’s letter to Senator Blumenthal?

To assess your request, we would need more information about whether, when, and how the Secretary has implemented this pause, including the instructions and training, if any, being provided to DHS and ICE personnel about the pause. At a minimum, we would need to immediately receive reliable information and assurances, such as a sworn declaration from the Secretary, with specific details describing exactly whether, when, and how the asserted pause on warrantless home entries has been implemented. We would need reliable details regarding exactly how and to whom the pause has been communicated, and how it is being enforced by Secretary Mullin, Director Lyons, and each layer of command down to all the DHS officers presently authorized to conduct such home entries. For how long does Secretary Mullin commit this pause will continue, and will your clients be prepared to certify to the court during any extension that there will not further warrantless home entries? Exactly what instructions and guidance, if any, have been communicated throughout DHS regarding the timing and nature of this pause, including with respect to the thousands of DHS agents who have already been trained to enter American homes without a judicial warrant since May 12, 2025 to the present?

warrantless home entries under the Home Entry memo or a similar policy. Plaintiffs would therefore need assurances of at least 30 days' notice from Secretary Mullin prior to any resumption of warrantless home entries, whether pursuant to the current Home Entry memo or any amended or superseding policy, including an assurance that any amended or superseding policy authorizing the resumption of warrantless home entries would also be provided to Plaintiffs and the Court with the same 30 days prior notice. We would also need agreement throughout the pendency of any extension that our clients will not be subjected to retaliation or adverse actions from Defendants, including warrantless home entries.

Second, we do not see a need for six months to review the policy of relying on administrative warrants to enter homes. Can you explain why you would need six months?

Apart from that, please let us know if Defendants will consent to email service moving forward, as we may want to file PHV applications before you enter an appearance on the docket.

Best,

Kristy

Kristy Parker
Special Counsel
Protect Democracy

On Wed, May 13, 2026 at 12:18 PM Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov> wrote:

Thank you, Kristy. We will be on the lookout for your email on Monday.

Stephen Tagert

From: Kristy Parker <kristy.parker@protectdemocracy.org>
Sent: Tuesday, May 12, 2026 7:46 PM
To: Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov>
Cc: shalini.agarwal@protectdemocracy.org; ashah@acludc.org; mperloff@acludc.org; Snead, Jacqueline Coleman (CIV) <Jacqueline.Snead@usdoj.gov>
Subject: [EXTERNAL] Re: Gibson Brown v. Mullin, No. 1:26-cv-1131

Dear Mr. Tagert,

Thank you for your email. COB tomorrow is an insufficient amount of time for Plaintiffs' counsel to discuss your request among ourselves and with our clients. We will get back to you with our position by COB Monday, and will

Very truly yours,

Kristy Parker
Special Counsel
Protect Democracy

On Tue, May 12, 2026 at 3:58 PM Tagert, Stephen (CIV) <Stephen.Tagert@usdoj.gov> wrote:

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Counsel,

I am the trial attorney assigned to the above-captioned case on behalf of the federal defendants. We plan to seek a 6-month extension of our answer deadline (June 5) to allow the Secretary time to assess the use of I-205s, which, as stated in the attachment, is currently paused. We are open to providing the Court JSRs every two months during that extension, however, if Plaintiffs wish to do so.

Please let us know whether you consent to this proposal by COB tomorrow, Wednesday, May 13. I am also available to discuss at the below phone number.

Thank you,

J. Stephen Tagert

U.S. Department of Justice | Civil Division (Federal Programs Branch)

Email Address: stephen.tagert@usdoj.gov

Phone: (202) 305-5486

