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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**

10 VICTORIA LAW,
11 PLAINTIFF,
12 VS.
13 FEDERAL BUREAU OF PRISONS,
14 DEFENDANT.

CASE No.: 4:24-cv-06628-YGR

**DECLARATION OF CAITLIN KELLY
HENRY IN SUPPORT OF PLAINTIFF’S
NOTICE OF SUPPLEMENTAL EVIDENCE**

15 I, Caitlin Kelly Henry, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the
16 following statements are true and correct:

17 1. The following statements are made of my own personal knowledge except as to those matters
18 stated to be based on information or belief. If I were to be called as a witness, I could competently testify
19 about what I have written in this declaration.

20 2. Attached hereto as Exhibit A is a true and correct copy of email correspondence I sent to and
21 received from Assistant United States Attorney Michael T. Pyle.

22 3. On October 2, 2025, I emailed AUSA Pyle regarding the Bureau of Prisons’ failure to transmit
23 the September FOIA release, as required by Judge Tse’s monthly production schedule. (*Dkt.* No. 42) A
24 true and correct copy of this correspondence is attached as Exhibit A.

25 4. On October 6, 2025, AUSA Pyle responded that explained that the Bureau of Prisons’ FOIA
26 staff had been furloughed due to the lapse in appropriations that began on October 1, 2025. Attorney
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1 Pyle has been unable to obtain any information from BOP about the stop in production due to the
2 government shutdown and furloughs described in the email. AUSA Pyle further stated that, although he
3 had not been furloughed, he was “only permitted to work on certain matters that fall within the Anti-
4 Deficiency Act” and that he was “not permitted to work on the instant case during the lapse in
5 appropriations.” He advised that he would respond to my inquiry “as soon as the lapse in appropriation
6 ends and [he is] able to speak with BOP FOIA staff.”
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8 5. Based on this representation, the United States Attorney’s Office has confirmed that it will not
9 meet and confer with Plaintiff’s counsel or engage in any case-related communications during the
10 government shutdown. As a result, Plaintiff has been unable to obtain any information from the Bureau
11 of Prisons or counsel for Defendants regarding the Court-ordered monthly FOIA production, which
12 stopped.
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14 DATED: August 19, 2025

15 Signature: _____/s/_____

16 By: Caitlin Kelly Henry, Esq.

17 **Exhibits to Henry Decl.**

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19 A. October Email Exchange with Assistant United States Attorney Pyle
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