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8 *Federal Bureau of Prisons*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 VICTORIA LAW,

12 Plaintiff,

13 v.

14 FEDERAL BUREAU OF PRISONS,

15 Defendant.

Case No. 3:24-CV-06628-YGR (AGT)

**DECLARATION OF MICHAEL T. PYLE IN
SUPPORT OF DEFENDANT’S OPPOSITION TO
PLAINTIFF’S MOTION FOR ORDER TO SHOW
CAUSE AS TO WHY BOP SHOULD NOT BE HELD
IN CONTEMPT**

Date: December 26, 2025
Time: 10:00 a.m.
Courtroom: A
Hon. Alex G. Tse

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20 I, Michael Pyle, make the following statements under oath and subject to the penalty of perjury:

21 1. I am an Assistant United States Attorney and I represent the Defendant in this case. I am
22 a member of the bar of this Court.

23 2. Attached as Exhibit 1 to my declaration is a true and correct copy of an e-mail I sent to
24 Plaintiff’s counsel on October 6, 2025, in which I explained that all BOP FOIA staff had been
25 furloughed due to the lapse of appropriations and that I was unable to work on the case for the same
26 reason. My e-mail was in response to an October 2, 2025 e-mail from Plaintiff’s counsel inquiring
27 about status of the September 2025 FOIA release.
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1 3. Attached as Exhibit 2 to my declaration is a true and correct copy of an e-mail from
2 Plaintiff's counsel dated Friday, November 14, 2025 asking for information about BOP's position on a
3 number of matters, including BOP's position "regarding a potential Motion for an Order to Show Cause
4 why the BOP should not be held in contempt of Judge Tse's Order requiring completing of the
5 September production before the shutdown." Her e-mail also stated: "We recognize that the government
6 shutdown has caused significant disruption and appreciate the challenges that your office and the Bureau
7 of Prisons have faced during that period." She also stated: "I recognize things must be very busy."
8 Plaintiff filed the motion for an Order to Show Cause on Tuesday, November 18, 2025.

9 4. Plaintiff is correct that work has been extremely busy once the lapse in appropriations
10 ended. I was busy with a large number of other matters, including liability presentations on various
11 affirmative cases and Relator interviews that I was preparing for on November 14, 2025, the subsequent
12 weekend, and the following week. I had been planning to respond to Plaintiff once some of those events
13 were completed, but she filed the motion two business days after her e-mail.

14 I declare, under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct
15 to best of my knowledge.

16 Dated: December 2, 2025

17 *Michael T. Pyle*

18 _____
19 Michael T. Pyle