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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VICTORIA LAW,

PLAINTIFF,

VS.

FEDERAL BUREAU OF PRISONS,

DEFENDANT.

CASE NO.: 4:24-CV-06628-YGR

DECLARATION OF CAITLIN KELLY HENRY IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER TO SHOW CAUSE AS TO WHY BOP SHOULD NOT BE HELD IN CONTEMPT

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

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

2. Ms. Law has informed me that she is currently preparing two investigative articles for imminent publication that rely on records responsive to the FOIA request at issue in this case. She has further informed me that these articles concern conditions of confinement and post-closure transfers affecting people formerly incarcerated at FCI Dublin and individuals now held in federal prison and immigration detention.

3. Based on my communications with Ms. Law and my knowledge of related legal matters, the records withheld by the Bureau of Prisons may bear directly on applications for release, transfers, or

other relief for individuals in custody. It is my understanding that timely access to these records could assist advocates, counsel, and courts in identifying constitutional violations, and other bases for relief that may have life-saving implications for people held in federal prison and immigration detention.

DATED: December 9, 2025

Signature: ____/s/_____

By: Caitlin Kelly Henry, Esq._